

Appendix 2 - Analysis of submissions

APPENDIX 2

CHAPTER ONE - Introduction

Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
1.5	Mention Outer Green Belt Management Plan and the link to Town Belt	126	-	Accept	Add section on Outer Green Belt to 1.5
All	Name is "Wellington Town Belt"	215	There is some uncertainty as to the full legal name of the Town Belt. The legislation and Deed talk about the Town Belt. The previous plan uses Wellington Town Belt in its title but Town Belt in the text.	Partly Accept	Change all references to "Town Belt" to "Wellington Town Belt" in the titles and chapters heading. Note in the first chapter that in the text the wording will be shortened to Town Belt.
1.5	It is not clear how the Plan fits with other Council Strategies and Policies eg if policy is contrary to Plan which takes precedence	140	Look to add in diagram to show relationship of plan with other Council policies	accept	add in illustration
1.5	concern provisions and rules about leases should be in accordance with WT BMP eg allow for removal of buildings. Not Councils Leases Policy	215	The current leases policy does identify that the policy provisions need to be consistent with what a management plan allows.(section 5 page 4)	accept	Add in relevant section from Leases Policy to show relationship between the two policies.
1.5	some policies rely on other plans and policies which may change during 10 years of MP	95	Similar to all management plans. May require minor revision of the plan if these changes cause conflict between policies	Noted	
1.5	no mention of implication of these plans for TB. Suggest list plans in section 1.5 and note implications in relevant sections of the MP	95	Plans are identified as giving guidance. May need to expand this introduction to explain the context.	Accept	Add in short section and framework diagram to explain the context viz a viz these other plans and policies.
1.3	Order of key themes - some have greater weight	215	Have considered order of chapters but they do not follow an order of importance and they work well as they are with the generic chapters early on and the sector plans at the end.	Reject	The chapter order is not designed to give greater weight to those at the beginning.
1.3	pg 4 final sentence. Question if complexity of each sector is recognised in each sector	215	Consider Ch 8 sectors then consider 1.3	Accept	change wording from complexity to "differences in"
1.3.1	include Botanic Garden into Town Belt. Amalgamate BG management plan	215	The Council has developed a series of operative management plans that reflect both geographical as well as functional activities. The Botanic Garden management has been linked to the other gardens such as Otari Wiltons Bush to reflect its role and future management	Reject	
1.3.1	need to refer to management policies that do/will apply to Wellington Showgrounds land	215	The showgrounds are not covered by the policies in the Plan but through the Premises lease.	Reject	The area is not currently managed as part of the Town Belt with activities unrelated to public recreation. It is not necessary or useful to have the plan cover the activities within this area.

1.4 (1)	do not agree Upper Weld St access encroachment has been resolved	215	There is still some uncertainty over the actual resolution of what is and is not Town Belt in this area. This will be resolved during the legislative change	Accept	Remove the sentence that notes its resolution. APPENDIX 2
1.5	ensure reference to Town Belt is to inner Town Belt	215	There are some differences in terminology used between the District Plan and Management Plan. The term "inner town belt" is not the official name of the town belt under the legislation or the deed.	Reject	Retain name but review terminology used for the Town Belt in the later District Plan review.
1.3.1	85ha - will be protected under Deed when Bill enacted	217	consider either changing map on page 6 "land to add to TB deed" or adding sentence or footnote to 1.3.1 about Council intention is to add 85 ha to Deed	Accept	Add footnote.
Map	indicate Botanic Garden on first map (like 2nd map)	217		Accept	
1.2	Error - 1871 Act transferred TB from Superintendent to Mayor, Councillors ... Actual transfer via deed	217	Will change the wording to reflect that the act instructed the transfer which finally occurred when the Deed was settled in 1873.	Accept	Wording changes
1.2	Should mention date of TB Deed 20 March 1873	217		Accept	add date
1.3	Botanic Garden 1839 did not suggest BG be part of TB. Suggestion of Town Council in 1843	217	Changed wording to be consistent with the history outlined in the Botanic Garden management Plan	Accept	Changed wording to clarify the process.
1.5	District Plan - add clause about TB "valued for its historic, social, cultural importance"	217		Accept	Clause added
1.2 & Ch7 & Appendix 3 & 4	focus on future not Maori revisionist history. Creates unease and contention not relevant to plan	250	Respective historical chapters important to understand the context of the Town Belt concept and the early relationship with Maori	Reject	
1.2 & Ch7 & Appendix 3 & 4	history should be factually correct and uncontroversial	250	The historical accounts give context and differing perspectives.		
1.3.1	Wellington Zoo - historic, public esteem - importance should be acknowledged	72	The Zoo is mentioned in several places including the history appendices.		
8.6 or 7	consider heritage structures at zoo	72	will consider under Culture and History chapter		
... & Ch1.5	how does Management Plan stand under RMA (see drafting instructions	77	The TBMP is not considered a statutory document under the District Plan. Essentially the Open Space C zoning has been incorporated into the District Plan to give effect to the TBMP from a regulatory planning perspective	Accept	Add some explanatory text into the section to note the relationship.
1.5	would like Management Plan incorporated into Open Space C provisions of District Plan	77	See comments above. The provisions in the current plan will be reviewed and if appropriate incorporated into the review of the Open Space C zoning when the DP is reviewed.	Reject	Not able to add the provisions as part of the Management plan review process.
-	review Open Space C this year	77	see note above		

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1.2	429ha was not conveyed to WCC but to "Mayor, Councillors ..."	88	agreed	Accept	Wording changes
1.2	believe Deed "remains most important document..." is not supported by proposed legislation	88	This is an issue for the drafting instructions not management plan	Noted	
1	Lacks sense of strategic direction/long-term results	95	Look at putting in a short section at the start of section 1.3 outlining a long term vision .	Accept	Ad vision
1	provide details on major decisions over next 10 years eg legislation, Ruahine St ...	95	Look at putting in an implementation plan outlining the major achievements proposed and their priority	Accept	Add implementation plan as appendices
1	lack summary of TB values. Assessment criteria provide starting point. Include 3 stages: original values; recent values compatible with original concept; recent values not necessarily compatible but acceptable today. Gives some eg	95	The current values are encapsulated within the guiding principles. Not sure of the value in assessing how the current values have changed in more than general terms. Look to bring the assessment criteria from page 19 towards the front.	Accept	Criteria added to section 1.2
all	some statements read like policy but role in decision making not explained	95	review each section to ensure all policy direction is indicated within the policies and objectives.		
1	add a vision (eg Dunedin TBMP)	95	check the original aims/vision in the 1995 plan.		vision added
1	start with purpose of MP, who will use it and how it will be used. Include more eg some examples from Dunedin TBMP	95	add in section about role of management plans and what they do. Check both this suggestion and the section in the Northern Reserves Plan.	accept	
ALL	inconsistency in language style of objectives and policies	95	review all policies for consistent style		
ALL	lack glossary	95	add glossary for major terms. Review which are needed	Accept	
1.1 & 2.8	Town Belt concept - mentioned in 1.1 and again in 2.8. Two weaknesses: fails to capture residents relationship with TB; strays into wider discussion about value of open space in city	95	Brought the values and criteria forward into first section.	Accept	
1.1 & 2.8	Objective 2.8 - move closer to explanation on TB concept	95	look to move this to start of section. And all objectives and policies to start of each section.	Accept	Bring objectives and policies to start of chapters
2.8 & 1.1	Consistent across what, with what. What does strengthen mean	95	SEE RESPONSE TO Ch 2		
1.1	Town Belt concept - doesn't mention why opposition to developments on TB, sense of ownership, loss of land etc	95	No need to go into this level of detail. The various objectives and policies throughout the document emphasise the balance between conservation and development,	noted	
1.1	2 components of concept: horse-shoe shaped area, free recreation. Key part of heritage passed down by settlers.	95	Brought the values and criteria forward into first section.	Agreed	
1.1	lack clear statement about original TB concept	95	see above		

1	compare eg TB ha vs all open space in city ha	95	Replace the map on page 3 with a map showing the context of the Town Belt re the wider city and Outer Green Belt. Add short section on the role of the Outer Green Belt.	Agreed	Add into section 1.2
new	lack info about cost of core functions eg mowing lawns - could include at end of intro - dose of reality for citizens. Develop understanding of trade-offs decision-makers have to make	95	Difficult to reflect the costs accurately given the myriad of activities on the Town Belt from playgrounds to sportsfields and walkways.	rejwct	
new	details about encroachments - add specific objective to resolve all	95	These could be included re the overall programme for the next ten years but there is no need to put an objective in here as it is well covered in the rules as a prohibited activity.	reject	
1.3	purpose does not include history and culture - only looks to future	250	This is reflected in the principles and in its distinguishing features	noted	

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CHAPTER TWO - Town Belt legislative and policy framework

Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
2.3	question charitable trust. Should be "the Trust"	215 & 217	remove the term charitable	Accept	
2.3	... being held in Trust by the Council, the Wellington TB is administered by the Council in terms of the Reserves Act 1977 as ...	215	Accept part of this as being held in trust. However the explanation of the administration is discussed later and does not require clarification here.	partly accept.	change words
2.9.4	.. physical continuity of the horseshoe shape of the Wellington Town ..	215	The existing words provide adequate description of the "perceived" continuity and the statement open space emphasises that it is in contrast to the built environment	reject	
3 and 2.6. and 2.9.5	policies around working with PNBST to reinstate former Town Belt - differs little from original "land grab" objectives of NZ Company	87	The policies are based on a partnership approach and recognise that whichever party has legal precedence over land return through RFR or the Public Works Act that they will work together to achieve a joint outcome.	reject	
	should state where TB fits in overall strategy for Wellington's open spaces.	87	will add in reference/,map showing its place in the overall open space framework in chapter 1	accept	Maybe change map on page 3 to show its position in the overall network.
	If differences in policy (from other Council policy), should be clearly identified	87	will review to ensure any differences are identified and noted.	accept	

1.1 & 2.8	Town Belt concept - mentioned in 1.1 and again in 2.8. Two weaknesses: fails to capture residents relationship with TB; strays into wider discussion about value of open space in city	95	SEE RESPONSE IN CH 1	accept	Suggest it be shortened " To protect and enhance the historical integrity and role of the Wellington Town Belt.
1.1 & 2.8	Objective 2.8 - move closer to explanation on TB concept	95	SEE RESPONSE IN CH 1		see above
2.8 & 1.1	Consistent across what, with what. What does strengthen mean	95	look to rewrite Objective 2.8	accept	Suggest it be shortened " To protect and enhance the historical integrity and role of the Wellington Town Belt.
7 & 2 and sectors	any plans to include other areas as TB - may diminish "heritage status" and "historic integrity"	230	The Town Belt is not only an historical artifact but a unique area of open space with multiple values for the residents of Wellington. Its protection and development needs to reflect their changing needs.	reject	
	support change - need more unbiased info about need for change, different options	250		noted	
2.2	unconvinced guiding principles are generally accepted view - caution exercised before translating them into law	250	Have already consulted on the guiding principles and have been approved by the Council.	reject	
2.7 & 2.9.4	add more than 85ha - include all relevant green spaces	112	The proposal to add 85ha has been based on an assessment of the value of this land and it fitting the criteria established for Town Belt land. .	noted	
2.5 & Ap 4	question Council mandate to abandon grievance with Crown. If 2.5 dropped from plan, capture in App 4	84	The Council mandate to abandon the policy is through this policy review and the replacement of the Reinstatement policy with the new management plan.The Council approach will be one of partnership with mana whenua.	noted	
2.9.3	compensation land immediately adjacent to TB and equivalent in area. Alienated land was for Wellingtonians under original deed - return should happen anyway	231	The Council plans to work with the Crown to return these lands. Experience over the past 15 years is that the Crown or its SOE's have negotiated different deals depending on the circumstances.	noted	
2.7 & 2.9.4	all former Town Belt should, where possible be reinstated to Deed	102	Look to change the order and criteria of 2.9.4 to list the point about original town Belt first rather than last.	accept	
2.9.4	only add former TB land to Deed	134	The proposal is that all of the land added would be treated in the bill as if it were covered under the 1873 Deed.	reject	
2.9.4	only add former TB land to Deed	197	see response above		

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2.9.4	give more weight for "original TB" land - criteria	26	Some changes could be made to the assessment criteria in 2.7 and policy 2.9.4 – for instance put the criteria on being original Town Belt at the start and in policy 2.9.4 point 2 add ".....and recreational values and linkages to neighbouring..... ." The criteria in 2.9.4 can be used to assess private land as well as public lands.	accept	
2.9.3	Council should strongly defend TB & work for solution that avoids loss of TB	109		noted	
2.9.4	new criteria - adds to transport link (foot/bike) to network	55	This will be included within the criteria about complementary recreational values	reject	
2.7	adding non-TB land - keep to minimum (compromise historic integrity)	77	The criteria emphasises the importance of the original Town Belt but recognises that other adjacent lands can compliment and enhance the Town Belt	noted	
2.9.4	the land must have ... 1841, or, in exceptional cases, adjacent land that is highly visible.	77	see comments above	noted	
2.7 or 2.9? & DI	adding new land needs public consultation, hearings and Council resolution. Plan needs to explicitly require public hearings as part of consultation process	77	The proposed Town Belt bill will go through a consultative process and will include all of the schedules of land to be added as Town Belt.	accept	
2.7	recreation value narrowly defined. Can enjoy green space by walking on footpaths	112	Maybe should add the words "informal" to the bullet point on under Assessment criteria	accept	availability for a wide range of sporting and informal recreation activities
2.7	include policy to Category 1: Land alienated from ... about land in private ownership that meets visual/physical continuity criteria (2.9.4)	126	add in further bullet point	accept	
2.9.4	missing 'accessibility & linkages' criteria from 2.7	126	could include the linkages wording in bullet point 2.	acceptlandscape and recreational values and linkages to...
2.9.4	should not add any land that was not part of 1873 deed. Criteria - Do not refer to 1841 original TB	126	The Plan acknowledges the important date of 1841 and that when any former Town Belt becomes available it should be included.	reject	
2.9.4	delete 2.9.4 (4)	126	Even though not covered by the Deed the Council policy is still to seek return of former Town Belt land.	reject	
2.5 & 2.9.5	delete reference to 'reinstatement'	126	This was the Council policy at this time to reinstate original Town Belt. The wording has been changed slightly	partly accept	The Council will work in partnership with the Port Nicholson Block Settlement Trust, the Crown, in particular the Ministry of Education and relevant Crown agencies where there is realistic potential for negotiations to result in reinstatement of of original Town Belt land to the Town Belt.

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2.6	abandon historic claims	126	could clarify with some wording addition to 2.6	partly accept	second para in 2.6 amended to "...approach to protection and retention of original Town Belt land....."
2.9.4	Use 1873 date. If want to add land then look at other values/criteria	126	The Council policy is to recognise the significance of the original Town Belt and protect it becomes available from the Crown or Crown agency.	reject	
all	maps - misleading key "land protected by Town Belt Deed" "land to be added to Town Belt Deed". All land is managed as TB - some is protected by 1873 Deed. Some is protected as reserve	126		accept	clarify mapping and look to amend both maps in introduction
2.7	oppose addition of land where school situated - until a clear process of engagement between WCC and MOE agreed to	132	Can specify MOE as a key partner in policy 2.9.5	accept	change policy 2.9.5 to ".....the Crown, in particular the Ministry of Education and other Crown agencies regarding the .."
2.9.3	Add: The Council will endeavour to ensure that the Crown land sought falls within the boundaries of the Original Town Belt in 1841.	77	The criteria in the Plan will be used. One of the criteria is that the land was part of the original Town Belt in 1841.	reject	
2.7 & 7.2 DI	other appropriate land - qualified by addition of non-TB land "appropriate adjacent and highly visible land"	77	can look to change the wording slightly to emphasise the importance of the 1841 date. However the other wording around highly visible etc is better encapsulated with the other criteria around visual continuity etc.	noted	
2.7	new criteria - cost/benefit to ratepayer of acquiring land. Need transparent process to make decision to acquire land which would include this information.	77	add in another policy based on the guidelines for land acquisition	accept	added additional note to policy
2.7	Adding more land - if seeking World Heritage Status, the status may be affected if TB does not remain as close to borders of 1873 TB land	88	Noted. At this stage it is not proposed to move forward with any application but to focus on recognition through Historic Places Trust registration.	noted	
2.9.2	adding land would not enhance historic integrity	88	Neither would it detract from it. The assumption here is that the only value of the TB is as an historical artifact	reject	
2.9.2	If have 2.9.1, then 2.9.2 "retaining size" not necessary	88	This implies that land could be lost through such things as Public Works Act losses but that overall the size will be retained.	reject	
2.9.2	retained and appropriately restored.	88	Need to keep enhanced as it could mean larger. Restored implies taking it back to what it originally was. Enhanced implies it can get larger.	reject	
2.9.3	value for incorporation into the TB.	88	agree	accept	amend policy 2.9.3 to "for incorporation into Town Belt.

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2.9.3	primary duty of Council is to find solutions which do not require land to be taken by the Crown	88	agreed and this is explained in section 2.7 where it notes that the Council will continue to protect the TB under the Deed.	noted	
2.9.4	original TB - should be first criteria	88	agreed.	accept	
2.9.4	remove ecological criteria. This land could be protected as reserve rather than TB	88	This is one of several to be considered together. Agreed on its own will probably not be enough but taken collectively it adds to the overall assessment.	reject	
2.9.4	reinstate alienated original TB	92		noted	
2.7 & 2.9.4	criteria inadequate. All land historically TB should be reinstated	93	moved historic criteria to the start of the list.	accept	
2.9.3	... Council in its role as trustee will pursue	113	Do not agree there is a need for clarification. The current role of the Council as trustee of the Town Belt is well known and understood.	reject	Officers recommend that the plan refer to the legal position of the Council as trustee by adding a section to 8.8.2: The Council holds the Town Belt in trust and any negotiation around sale or exchange of land for roading needs to be carefully managed and the legal issues fully considered. It is noted that NZTA has the power to compulsorily purchase the land required from the Council.
2.9.3 with Crown land of equal... Why? If Council gets financial compensation may be able to acquire replacement land from private landowners	113	probably best to retain Crown and add "other"	accept	
2.9.8	not possible to remove land if 2.9.2 is to retain and enhance physical size of TB	126	The policy is an overall intent and could mean that land can be removed as long as land is replaced into Town Belt,	reject	
2.9.3	Should Transit NZ take TB, compensation sufficient to buy TB some equivalent benefits elsewhere	171	agree and this is consistent with policy 2.9.3	noted	
2.9.4	seek other land that improves ecological connectivity of TB (but see no value in adding places like Tawatawa)	186	This is one of the criteria	accept	
	Historic culturally important to only add original TB - or dilute it. Think TB should retain special status	92	The criteria emphasises the importance of the original Town Belt but recognises that other adjacent lands can compliment and enhance the Town Belt	reject	
7.2 & 2.7 (MP)	do not agree - include any other land Council considers ought to be legal TB. Should only be done in compliance with criteria in Plan	191	SEE RESPONSE DRAFTING INSTRUCTIONS		
2.7	schools would still be able to use land as they have been into the future	132	Any return of land into TB would recognise current uses. The proposal is only to seek return of lands no longer used for school purposes.	noted	

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2.9.4	TB important rec area for schools & pedestrian access to schools important. Not part of criteria to assess potential additions to TB. Covers 2.7 linkages to key community destinations	132	see below		
2.9.4	2.7 has Accessibility & linkages criteria - but not criteria in 2.9.4 - should be added	159, 178	maybe add in a couple of words	accept	2.9.4 point 2 add ".....and recreational values and linkages to neighbouring ."
2.7 & 2.9.4	should include private-owned land in possible land additions that would meet TB criteria proposed in plan	159, 178	look to add in another bullet point under 2.7 1	accept	undeveloped private land
2.7	vacant, small in size, adjacent to original TB be considered for inclusion. Not important that TB areas 'joined up' and they have ecological value for birds - fly to next site	189		noted	
2.9.4	insufficient to express guiding principles. Do not adequately express given list of distinguishable features (p 19)	204	They are consistent with the principles	noted	
2.9.4	<ul style="list-style-type: none"> • The land strengthens the visual, ecological connectivity and/or physical continuity of the Town Belt's horseshoe shape... • The land may have ecological, historical and/or cultural features that require protection. - The land may have been... • The land enhances the provision of a range of sporting and recreation activities • The land enhances accessibility and provision of linkages to key community destinations 	204	Agree with first three. Fourth already covered within existing criteria	accept	
2.9.4	criteria 1 = land that was original TB. Criteria 2 = land continuous with TB complements original 'horse shoe' layout. Only criteria needed	209	check above criteria that are comprehensive and well linked to distinguishing features	reject	
2.9.4	Remove ecological criteria. This land could be protected as reserve rather than TB	209	This is one of several to be considered together. Agreed on its own will probably not be enough but taken collectively it adds to the overall assessment.	reject	
2.9.4	assessment criteria 1 not as important as retention & re-introduction of pockets of original TB land and adjacent green spaces. Birds use pockets as bird corridor	214	Note the importance of green space for bird corridors but that is only one criteria for addition to Town Belt. These other green spaces if owned by the Council can be protected as reserve.	reject	
2.7	new - "To support the diverse flora, fauna and green areas of Wellington as the lungs of the city."	214	Add to existing values	accept	change assessment criteria to "patchwork and diversity of exotic and native vegetation providing habitat for native fauna.

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2.7	patchwork - oppose astro-turf playing fields/public car parking	214		noted	
2.7	accessibility/linkages - as long as pedestrian foot access primary link & motor vehicle traffic is minimised	214	expand this to specify what the linkages are	accept	change to "accessibility and provision of pedestrian and cycling linkages to....."
2.7	see as much of original TB returned as possible	214		noted	
2.9.4	land original TB, lost since 1873 or adjacent. Unwise to add land away from semi circle	217	The criteria emphasises the importance of the original Town Belt but recognises that other adjacent lands can compliment and enhance the Town Belt	reject	
	My main desire would be that the added land added transport (foot/bike) links to the network, in addition to the criteria already listed	55		noted	
2.7 & 2.9.4	criteria narrow - does not adequately comply with principles 1,4,5,6	211	The criteria are based on the key features of the Town Belt identified in 2.7. have added more in to broaden them.	noted	
2.7	boundaries should be confined to 1840 to maintain historical integrity	237	The criteria emphasises the importance of the original Town Belt but recognises that other adjacent lands can compliment and enhance the Town Belt	reject	
2.7	criteria for adding land inadequate. All land former and current should be included	102		noted	
2.7	cost: benefit to ratepayer. Current criteria assume acquisition is foregone conclusion. Need transparent process	87	add in another policy based on the guidelines for land acquisition	accept	Policy 2.9.6 The Council will prioritise acquisition of land for return to Town Belt based on an assessment of its value as Town Belt and valuation
2.7	oppose removal of any land in TB	90		noted	
2.7 & 8.1.2.1 & 8.3.2	non TB land - may be cheaper to manage as reserve eg Western Slopes - like George Denton Park. no benefit in adding non horseshoe shape land	95	The overall costs of management should be no different but the standard management regime and policies will make ongoing management of activities more efficient.	reject	
7 & 2.2.4	want recognition of effort of William Tonks to protect TB	249		noted	add in a section to the appendices
2.3 & 8.2.2	legal opinion around ownership of Clifton Tce land. Various land transfers. Held for people of Wellington. Legal opinion would only apply to Crown land	28	No change required to chapter 2.	noted	
2.9.3	Council should consider voluntary arrangement with NZTA via s17 PWA	113	Officers recommend that the plan refer to the legal position of the Council as trustee by adding a section to 8.8.2:	noted	The Council holds the Town Belt in trust and any negotiation around sale or exchange of land for roading needs to be carefully managed and the legal issues fully considered. It is noted that NZTA has the power to compulsorily purchase the land required from the Council.

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2.7 & 8.6.2	inclusive - except retain "horseshoe" shape - does not seem to justify exclusion of important green spaces such as Tawatawa reserve	129	The exclusion of Tawatawa is more than just horseshoe shape. Its does not have a visual connection with the inner city suburbs or CBD. Neither is it part of the original Town Belt.	reject	
2.7 & 6.4.3	maintaining pedestrian access - to and from school important	132	SEE RESPONSE Ch6		
	acquisition should remain a priority - as funds permit	139	Note addition of policy around acquisition		addition of wording around this assessment has been added to the criteria
2.7 & 8.2.2	suspicious of Council's intentions. It has tried to sell Clifton Terrace twice in past. Clifton Tce "low-priority" for adding to TB - concern attempt to sell again	184	The Crown has attempted to sell Clifton Terrace on two occasions not the Council.	noted	
2.7 & 8.3.2.2	reject removal of any TB land from Deed eg Boyd Wilson	214	Boyd Wilson will be retained as Town Belt	noted	
8.3.2	oppose change from 1995 plan - from "potential addition" to "Council will not pursue acquisition of lands" in Hadfield Gully	214	The land is not at a high risk from development given its steepness and location.	reject	
2.7	horseshoe shape is irrelevant ecologically. Size irrelevant to organisms that disperse well or very small organisms	255	Noted but another criteria has been strengthened to reflect the ecological values.	reject	
	area should not be reduced	73		noted	
2.7 & 8.1.2.1	addition of Western Slopes appears marginal unless additional criteria - strengthening links with nearby areas of particular ecological value eg Otari (5.2 of draft)	73	added in ecological values. Also seen as one holistic area in a landscape and ecological sense.	reject	
2.7 & 2.9	return former-TB land. Continue to have a policy to return land whenever becomes available in future	90	Policy 2.9.5 essentially outlines this policy.	noted	
10 & 2.7	Provisions prohibiting sale of TB must be enhanced - no discretion to trustees	60	SEE RESPONSE DRAFTING INSTRUCTIONS		
	more the better unless land controversial	239		noted	
Ch6 SI & Ch 2 & DI	Additional TB land for sport - demark needs to be clear in law & in practise	36	see comment Ch 6	-	
CHAPTER THREE - Partnerships					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
3.1 and Ch6	no mention of interpretation or possible use of species for Mana whenua purposes	203	agree. Add policy (eg like Otari) around the use of native species for cultural purposes to Ch 6	Accept	add some context and policy around cultural harvest etc to chapter 6

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3.1	WCC should maintain an open mind on accuracy of acquisition of land from mana whenua by NZ Company. Further investigation is required	250	Waitangi Tribunal investigated this. Council will not be seeking a review of the Waitangi Tribunal ruling.	reject	-
3.1.2.1	Maori may have some relationship with certain lands but Town Belt concept introduced by NZ Company - so would not have been understood nor relevant to Maori at time who could not have perceived the desire for natural "green" city border.	250	The information about Town Belt being wrongly taken from maori was taken from the Waitangi Tribunal report.	noted	-
3	"the Council will work in partnership with the wider community including mana whenua and the wider community	250	Mana whenua have a unique and separate relationship with the Council that is different to the relationship with the wider community.	reject	-
3.1 & guiding principle	Guiding principle on partnership with mana whenua - one party is getting elevated	242	The Council will not be reviewing the guiding principle	reject	-
3 & guiding principle	for all citizens - not just groups	161	The Council will not be reviewing the guiding principle	reject	-
all	take into account Maori cultural and spiritual values in it policies relating to mana whenua and that these policies be integrated throughout the report	43	There are several places in the plan that refer to the relationship. For example Policy 7.5.7 regarding interpretation being developed in partnership.	noted	-
3.1.2.4 ?	policy is limited to Deed of Management with PNBST. Risk not achieving integrated approach and matters of great importance to Maori may be inadvertently excluded	43	Policy 3.2.2.1 & 3.2.2.2 would cover this. We could also look at ways to inform & involve Maori about projects and groups operating on TB	noted	-
	no policy to provide areas for growing puha	43	The Management Plan does not identify areas - but community groups can apply to grow food (community gardens policies). Could add note in 6.4.4 about this.. Add general policy around cultural harvest as well	partly accept	add note in 6.4.4. about gardening. Add general policy around cultural harvest
	absence of clear, consistent strategic approach (Council and iwi in general)- currently MOU. Lack clear relationship strategy. TBMP is not appropriate mechanism for outlining this so Plan should be put on hold until strategic approach is completed (eg via Open Space Strategy)	87	At this stage, an MOU with Council is the partnership approach favoured by iwi partners. The Open Space and Recreation framework will identify key outcomes for the open space network and will help prioritise projects proposed in this plan.	noted	-
	What does "partnership" (mentioned in guiding principle) mean in practise	87	Partnership means that both sides provide value, input and support into the relationship.	noted	-

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3 and 2.6. and 2.9.5	policies around working with PNBST to reinstate former Town Belt - differs little from original "land grab" objectives of NZ Company. Relationship - For benefit of city or short-sighted land grab	87	The policies are based on a partnership approach and recognise that whichever party has legal precedence over land returned through RFR or the Public Works Act that they will work together to achieve a joint outcome.	reject	-
	Councillors need to know more about developments with iwi, how to manage future relationships. Deferral of relationships to ,management plan (operational plan) is concerning	87	The management plan is the correct place to identify the policies by which both parties will work and contribute towards achieving the objectives in this plan.	noted	-
3.1	Oppose proposed partnership with mana whenua. What about rest of citizens in Wellington	160	there is a guiding principle for community (3.2)	reject	-
3.1	Insufficient research into cultural and historic merits of land - only looked at Wellington Tenth trust and Ngati toa (not other eg Waitaha, Kait mamoe)	246	The Council has relied upon the Waitangi Tribunal report (2003) in the development of this plan.	noted	
3	Change guiding principle " The Council will work in partnership with the community including mana whenua ... Obligation of 1873 Deed on Council and citizens of City of Wellington to work together	215	Do not recommend a change to the guiding principle around partnership with Maori. The guiding principle around community participation covers this	reject	-
3.1.2.3	"... the role of WCC and citizens of City of Wellington on matters..."	215	Mana Whenua has an MOU and relationship with the City Council who represent the citizens of Wellington city.	reject	-
3.1.1	delete "and development" from objective (not in guiding principle	95	agree. Keep consistent	Accept	change 3.1.1
3.2	Focus is on "hands-on" participation. Include research and submissions	95	agree	Accept	add advocacy and research to activities on TB in 3.2
3.2.2	New policy: To report to the public at least annually on progress towards key objectives in the TBMP and any associated activities. Eg land taken by Crown, Compensation received. Improvements to access. Encroachments resolved. Survival rates from plantings. Revenue from leases. decisions on applications for concessions	95	Officers will look at the range of possible indicators that could be used specifically for Town Belt.	partly accept	
	Want community to be able to comment on and provide input into MP, not just when plan is renewed	127	public will get opportunity to comment on applications for new buildings/extensions, leases, commercial activities landscape plans and so on.	noted	Appendix 5

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3.2 ?	Council/community groups should undertake activities with aim of educating and involving young people, understand uniqueness and significance, encouraged to participate	133	could add information into Chapter three to identify the potential role of young people.	accept	add in sentence to last paragraph in section 3.2 to identify the potential role of young people as a key group within the community with a future stake in the town Belt.
	Council role - encouraging conservation, ensuring leadership is given to young people	133	maybe add note in 3.2 around encouraging conservation and identifying the role of young people in community activity	accept	
3.2	sustained levels of volunteer effort of mountain biking community.	146	see response in 6.4.3	noted	-
3.2.2.2	Concern of mention of business. Community (sharing resources and making sure access to them is equitable) is not business. Suggests cafes etc will encroach - impact on rubbish, traffic, make one feel you have not been able to get away from it all	36	Business or commercial activity can occur on Town Belt if it complements to support the public's use and enjoyment of the reserve. There are already several such activities, for instance the Renouf Tennis Centre, cafes operating at clubrooms, for instance Wakefield Park. Any new activities would need to go through an assessment process outlined in Appendix 5	noted	
	plan too anglicised - what about reflecting other cultures/values	246	add policy about art to Ch 6	partly accept	add policy about art to Ch 6
3.1	MOU with PNBST did not go through proper process - public involvement	250	Parts 2 and 6 of the Local Government Act 2002 provide principles and requirements for local authorities that are intended to facilitate participation by Maori in local authority decision making processes.	reject	-
3.1	What does mana whenua mean and where is it mentioned in the Treaty of Waitangi?	165	definition of mana whenua is that taken from the Resource Management Act	noted	
3.1	have wider consultation. Maori networks are strong in city. May not get opportunity to input otherwise	43	The Council consults with the wider maori community in the city in a variety of ways including through a large network and database. Add in a section into 3.2 community participation about urban maori and add in a policy on cultural harvesting into the ecology chapter.	noted	Add in a section into 3.2 community participation about urban maori and add in a policy on cultural harvesting into the ecology chapter.
3.2.2.2 & 6.4.3	we need Council support to deliver trails that are built	146	Additional resourcing for new tracks is part of deliberations during the LTP. Proposing new policy about supporting volunteers	accept	Change policy 3.2.2.1 by adding ".....shall be encouraged and supported ."
3.2.2.1	Would like a new reference group for Town Belt	32	There are already many community groups involved in the Town Belt plus the Friends group. Not sure what the value of another group would be.	noted	-

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	how involved volunteer groups can support & enhance TB. Groups support Council with aspects of track maintenance	117	recognise volunteer effort building/maintaining tracks in Ch 3	accept	Add in another short section in 3.2 to outline the wide range of activities that these groups are involved with including track building.
6.4.3	various groups develop & maintain dual use & single use trails in city	141	see above	accept	add comment to 3.2 - currently X groups involved in track construction and maintenance on TB as well as revegetation projects. Building dual use tracks for all and some mountain bike only tracks where user safety is an issue.... eg downhill
CHAPTER FOUR - Landscape					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
4.3	why are policies on building/infrastructure included - contrary to Deed.	142	Not contrary to the Deed. The Deed does not specify whether buildings can be built or not.	reject	-
4.3	General rule - further buildings & infrastructure avoided, where unsafe, irreparable or of no further public recreation use, removed & land restored to public open space	142	The plan does not have a blanket rule about no further buildings. Policy not around no more building - around multiple use/intensive use of existing buildings. Policy 4.3.16 is a policy that identifies when buildings should be removed.	reject	-
4.3	Poor state of some buildings. New policy " All new leases and licences & their renewal must be subject to a bond being paid or guaranteed. This being sufficient to cover the cost of removal & the restoration of the site to open space. "	77	Not practical or reasonable to require lessees to provide funding or a bond. Leased buildings owned by the Council are on an ongoing maintenance programme. Ground leases require lessees to retain their buildings in good condition.	reject	-
4.3 & 5.3	separate heading - bring together aspects of TB management with implications for the resilience of the city. All naturally vegetated areas on the Town Belt (i.e. both exotic and indigenous) contribute to increased resilience through sequestration of carbon, reduced severity/risk of flooding, and reduced sedimentation in the harbour. We suggest placing more emphasis on the direct benefits of planting trees in preference to the emphasis in the draft on the ETS (section 5.3.3).	95	This is now included in the revised Ecology Chapter	accept	-
4.1.2	Botanic Gardens significant area should be covered in TBMP	215	botanic garden has its own management plan	reject	-

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4.2.2	New bullet point " historic, social & cultural change that has occurred over time as a consequence/result of use & management "	215	look at whether can incorporate in description rather than objective (4.1.1) need to review this but at this stage not sure what it will add. It lacks clarity around how it has affected the landscape.	reject	-
4.3.1	open to potential abuse. Strengthen eg ... TB if it is unquestionably proven to be necessary in the interest of the community and ...	215	The policy already has quite a high test in being " necessary " for public recreation.	reject	-
4.3.16	Wherever appropriate & timely existing structures practicable and at the cost of the previous user.	215	This does not really add any clarity to the policy. The issue of cost will be based on the terms and conditions of the lease between the Council and the leesee. Check condition of lease.	reject	-
4.3.1	reiterate policy 6.6.3 - " an assessment of alternative locations ... not on TB land for such a development will also be an essential prerequisite	77	also in Ch6 and Ch9	reject	-
4.12 & 5.5 Policies	mentions landscape Maori pre-history. But policy does not mention that Maori will be consulted over replanting or even participate as groups	43	The policies on landscape identify the major changes that have occurred over many generations going back to before European settlement. Polciies on public consultation with mana whenua and urban maori are in chapter 3.	noted	-
	Pockets of land every one thinks they are protected eg Clifton Tce	214	-	noted	-
4.3 & 5.5.11	All vegetation regardless of its origins should be nurtured - TB always covered in flora that serves all fauna & gives pleasure to all citizens for ever	32	Ecology - objective is to gradually increase natives - but there will still be exotics. Note new section 5.5.2	noted	-
	Keep some exotic trees - provide habitat, structure, history.	234, 231, 200, 82, 78, 57, 187, 176, 114, 214, 32, 6, 65, 57, 52, 23, 1	Recognise the ecological and landscape values of exotic forest. Add to ecology chapter	accept	add section to ecology chapter about the ecological and landscape values of exotic forest, tall tree framework (5.5.1)
	Concern at large scale removal of trees - scar on landscape	213, 193, 77, 55	No change to policy. Will generally be an arboricultural approach to managing trees in the first instance rather than on a forestry scale. .	noted	-
	support more native trees	22, 203, 36, 50		noted	-

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	pinus are dangerous, not needed	234, 253, 68, 246	No change to policy. Will generally be an arboricultural approach to managing trees in the first instance rather than on a forestry scale. .	noted	-
4.3 & 5.5.11	Concern removal of large areas of pines. New policy (a) significant removal and succession plans be prepared and released for public consultation at least several years prior to the event. (b) the land at the boundaries and upper hillsides be first cleared and newly planted at least several years before major removal. This to ensure the visual screening of bare lands and subsequent planting of young seedlings. (c) whenever practicable, removal be confined to individual or small groups of mature trees and that they be succeeded by new plantings compatible with the publicly agreed long-term succession strategy.	77	Will be more proactive over public engagement in developing replanting plans. Mt Vic Master Plan will identify long term vegetation plan. Most other sites have little change proposed in next 10 years Split the policy section into built environment and vegetation management. Ecosystem services incorporated into ecology chapter.	partly accept	
4.3.10	exotic forest removed over time as trees fall or become hazardous. Timeframes on maps "no plans" unless hazard. This left us wondering what if any conifer/pine removal is planned for the next 10 years.	95	review maps and text in sector plans. Clarify if needed. 4.3.17 - key priorities - from sector plans No plans formulated as yet but we can say that the emphasis will be on arboricultural works first and maybe identify through the sector plans the major areas we will focus on.	partly accept	
4.3.14	recommend that Council reinstate formal targets and milestones for the replacement of conifers/pines with indigenous species and habitats as per current plan.	95	Difficult to set formal targets as this will always be dependent on LTP funding. There is an increased focus on reactive removal and an arboricultural approach first rather than forestry principles. We can probably identify plans for indigenous areas on a more qualitative basis.	reject	-
4.3.12	did not find any explanation of the "mature-tree framework", referred to in policy 4.3.12. Is about trees along roads? Pine forests? Specimen trees in parks? Don't use word 'framework'	95	Now discuss tall tree framework in Ecology chapter (5/5/1).	Accept	change policy 4.3.12

4.3.13	policy seems to leave decision to discretion of the Council of the day. (see Footnote 9, page 32). Not clear if decisions may be made by staff acting under delegation without any public consultation, or if such decisions will be referred to the SPC.	95	This policy is very general and does not seem to add to the plan in any way. Suggest delete.	Accept	remove policy 4.3.13
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4.3	plant exotics eg eucalypts on northern aspects where it is difficult to establish natives	231	This will be considered as part of future master planning, particularly on Mt Victoria	noted	
5.4.3	restoring native bush makes it more valuable, more like to survive	122	-	noted	-
	large invasive species eg sycamores will eventually take over unless removed	163	sycamores do provide an important role in providing tree cover, reducing erosion and run off on steep slopes. The plan in places such as Te Ahumairangi is to limit their spread but not to look at wholesale removal.	noted	-
5.4.3	coming generations benefit from our foresight in revegetating it	203	-	noted	-
5.4.3	support increase in native trees. We need shade protection outdoors - better than isolated man made shelters	36	-	noted	-
5.5.9	don't need to be too precious about if plants existed before - ok to have pohutukawa	48	Planting of indigenous ecosystems will be using local natives. Pohutukawa still have a place but as landscape and amenity plantings not as part of the developing native forest.	noted	-
	more natives - unique for visitors - but oppose if restricts bike access	50	no plans to restrict - keep to formed tracks	noted	-
5.4.3	pine trees not a successful feature	68	-	noted	-
	renew 'native ecosystems', enhance 'ecoforestry' quality - productive character	79	restoration of native habitats - long term. Not on forestry production values	reject	-
	other vegetation should have chance to prove their worth	7		noted	-
5.5 & 8.5.3	underused, informal grass areas - should revert to wilderness with some planting. Stop mowing gorse eg above Liardet (Hutchinson/Dransfield)	82	Policies within the Ecology chapter (5.2.1 and 5.2.2) will identify these types of areas and prioritise them for planting and restoration to indigenous ecosystems.	noted	-
	plant more natives. keen to see more fruit trees and orchards for the people. Don't decrease green belt/forest over sportsfields	83	-	noted	-

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	Exotic trees so old & in danger of toppling. Rapid growth & takeover of sycamores a concern.	234	Sycamores do provide an important role in providing tree cover, reducing erosion and run off on steep slopes. The plan in places such as Te Ahumairangi is to limit their spread but not to look at wholesale removal.	noted	-
	Importance of retaining/extending natural area & avoid encroaching by sports development needs	234	plan identifies areas for sport development.	noted	-
	scenic hardly - millions of pines/macrocarpa in NZ. Get rid of them	246	obj in Ch 5 - to increase natives	noted	-
4,6 & DI	oppose legislation/policies that allow council to have 'flexible powers'; 'commercial activities & events' & "construction of buildings considered "desirable" to decision makers"	100	SEE RESPONSE Drafting instructions	-	-
	plenty of places for development in and around Wellington	52	(response in Ch 6)	-	-
CH 4	would not support more native flora if meant restrictions on bike access	50	-	noted	-
4.3.16 & 6.4.2	exception to removal - structures that have cultural, architectural, historic or archaeological significance	103	We will consider the significance of any building that is identified for removal because 1) no suitable use can be found or 2) the building is dangerous. We will discuss with	accept	amend 4.3.16 to note assess historic significance of building before considered removing it
4.3.6	do not support colour scheme to minimise visual impact - leads to tedium. Buildings should be designed to support TB but need to be legible, easily found, function understood	177	change policy 4.3.6	accept	Existing buildings and structures shall be revised as each comes up for attention (either by Council or lessee) to ensure that they are well integrated and complementary to their surroundings.
4.3.16	find uses before propose removal of buildings	177	Agreed that this will occur before removal.	noted	-
CHAPTER FIVE - Ecology					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
4.12 & 5.5 Policies	mentions landscape Maori pre-history. But policy does not mention that Maori will be consulted over replanting or even participate as groups	43	Maori and the wider community will be consulted as required especially around cultural planting and harvesting. This is covered in the recreation section. The Council encourages a wide variety of groups and individuals to become involved in community activity on the town belt and in other reserves	noted	
	encourage planting that encourages revitalisation of native birds - relationship with birds important for Maori	43		noted	

5.4.3	Support increasing indigenous cover on TB.	172		noted	
5.5.6	indigenous habitat restoration work carried out by Council will be prioritised around a - ensuring ecol connectivityand adjacent reserve land and land being restored by community restoration groups.	172		noted	APPENDIX 2
5.5.16	add in an extra point c- areas which impact on areas being restored by community groups.	172	The issue here is to ensure adjacent reserve land is not unduly impacted by activity on Town Belt. Could add in a few words to policy 5.5.16 (b)	accept	
5.4 & 5.5	support criteria but not at exclusion of retaining established exotic trees - habitat, canopy	214		noted	
5.5	surplus seedlings from private gardens could contribute to the restoration	95	provided they are from local indigenous plants	noted	
4.3 & 5.5.11	Exotic veg has community & personal value	1	5 - provide habitat, shelter, winter food ...	noted	
4.3 & 5.5.11	hope a sympathetic attitude towards historic exotic veg	23	SEE RESPONSE 4.3		
5.1.6	sign post historic and archaeological sites	32	As funding allows key sites will be signposted and identified		
4 & 8.1.3	no reference to felling of "inconvenient" trees. Provide shelter, shade, manage water, erosion, habitat.	32	Exotic trees provide habitat for animals, shelter and some are a source of winter feed.	partly accept	Exotic trees provide habitat for animals, shelter and some are a source of winter feed.
4.3 & 5.5.11	All vegetation regardless of its origins should be nurtured - TB always covered in flora that serves all fauna & gives pleasure to all citizens for ever	32	SEE RESPONSE 4.3		
4.3 & 5.5.11	healthy, mature trees - do not support removing them	52	SEE RESPONSE 4.3		
4.3 & 5.5.11	Do not support mass felling of exotics - need managed transition	55	SEE RESPONSE 4.3		
4.3 & 5.5.11	eucalyptus & macrocarpa forest should be conserved - significant ecological & aesthetic values - eg winter feed for tui	57	SEE RESPONSE 4.3		
4.3 & 5.5.11	some iconic exotic trees - nice to keep unless they pose a hazard	65	SEE RESPONSE 4.3		
4.3 & 5.5.11	Pine trees look good, part of our history, could earn council money. Place for them in TB	6	SEE RESPONSE 4.3		

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4.3 & 5.5.11	<p>Concern removal of large areas of pines. New policy (a) significant removal and succession plans be prepared and released for public consultation at least several years prior to the event.</p> <p>(b) the land at the boundaries and upper hillsides be first cleared and newly planted at least several years before major removal. This to ensure the visual screening of bare lands and subsequent planting of young seedlings.</p> <p>(c) whenever practicable, removal be confined to individual or small groups of mature trees and that they be succeeded by new plantings compatible with the publicly agreed long-term succession strategy.</p>	77	<p>Will be more proactive over public engagement in developing replanting plans. Mt Vic Master Plan will identify long term vegetation plan. Most other sites have little change proposed in next 10 years Split the policy section into built environment and vegetation management. Ecosystem services incorporated into ecology chapter.</p>		
4.3 & 5.3	<p>seperate heading - bring together aspects of TB management with implications for the resilience of the city. All naturally vegetated areas on the Town Belt (i.e. both exotic and indigenous) contribute to increased resilience through sequestration of carbon, reduced severity/risk of flooding, and reduced sedimentation in the harbour. We suggest placing more emphasis on the direct benefits of planting trees in preference to the emphasis in the draft on the ETS (section 5.3.3).</p>	95	<p>new section now included to identify the overall role of the Town Belt in ecological resilience</p>	accept	<p>new section added to chapter</p>
4.3 & 5.5.11	<p>Very old trees have become enemies. They have a purpose. Founders say under them</p>	214	<p>SEE RESPONSE 4.3</p>	noted	
	<p>The restoration and enhancement of the Town Belt vegetation and ecosystems is essential to its long term vitality and value to the City and its citizens.</p>	102		noted	
	<p>Restoring the natural ecosystems supports Wellington's green credentials, providing beautiful areas for us to enjoy</p>	105		noted	
	<p>A gradual increase in indigenous vegetation replacing exotic plantings maintains tree cover providing a forest or bush landscape through the transition</p>	107, 112	<p>This has now been made more explicit in the ecology chapter</p>	accept	<p>target added in to objectives at start of the chapter</p>

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Obviously I support the planting of indigenous vegetation but I don't want to see exotic trees taken down for any reason other than extreme old age.	114	Arboricultural approach as a first priority when managing trees - not forestry. There will still be a requirement to remove trees when the risk and costs of maintenance become too high.	noted	
The work of the council and volunteer groups across the city has brought a marked increase in native birds, especially in the "inner suburbs".	117		noted	
I believe that the reinstatement of indigenous plants on the town belt will enhance the appreciation of Wellingtonians for our natural environments.	117		noted	
More local flora and fauna is extremely desirable.	11		noted	
Policies – Ecological and biodiversity 8.1.4.1 and 8.1.4.2 Recommendation: given the proximity of mature indigenous forest in Otari-Wilton's Bush, the Botanic Garden, Trelissick Park, Huntleigh Park, and the increasing numbers of kererū, tūī, kākārīki and korimako in the city, thanks to GWRC's determined control of pest animals, and the work at Zealandia, the seeds of podocarps and broad-leaved tree species will be deposited on Te Ahumairangi in time, so the expenditure of time and money on the planting of locally appropriate, eco-sourced native species cannot be justified. 8.1.4.4 This work is essential – pest animals are reasonably easy to control. The control of pest plants and other weeds is more difficult, and should be increased dramatically, to take advantage of the future removal of exotic trees, whether by storms or felling	120		noted	
Restoring the Town Belt to native New Zealand / Wellington bush makes it more valuable as a reserve, and more likely to survive for future generations	122			

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I support the proposals to restore and enhance ecosystems within the Inner Green Belt	29, 30, 36, 44, 57, 73, 76, 80, 93,126, 132, 133, 136, 138, 159, 163, 182, 203, 205, 207		noted	
The resource of the Town Belt is a major and accessible asset offering high quality of life in Wellington City. To not make its ecological character local and restore its original qualities as much as possible is to lose a vital opportunity for connecting to what makes us uniquely who we are.		The plan is to identify, protect and restore native ecosystems on Town Belt.	noted	
The town belt offers a wonderful opportunity to provide a green corridor for native wildlife in the city, and it makes ecological sense to replant native vegetation and trap introduced animals to create a healthy well functioning natural ecosystem	127		noted	
Natural eco-systems are in general easier to maintain (e.g. vs. pine trees) and provide a more rewarding experience for running / walking / cycling within. As the trees on Mt Victoria and other areas come to the end of their useful or safe life they should be removed and replaced with native species, species that are endemic to the local area (rather than NZ natives from other regions, e.g. Karo or Pohutukawa, which shouldn't be actively planted).	139	Add a new policy 8.9.3.1 outlining the need for a long term landscape development plan for Mt Victoria which will integrate future landscape change, vegetation management and recreational activities.	accept	change as outlined
Want to see the town belt as an ecological corridor that links to Karori sanctuary and beyond	15	It forms a continuous protected link between the inner and outer green belts via Polhill and Zealandia.	noted	

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	<p>The last management Plan was hamstrung by the attempts to preserve the pines on Mount Victoria and to preserve an open understory. There are plenty of native plants that could be planted in monocultures to achieve the same effect.</p> <p>The http://www.holtforesttrust.org.nz/ Holt forest is a great example and should be visited by your town belt planners - extensive Kauri totara, rimu kahikatea and (from memory) beech monocultures. You can achieve a sustainable carving resource for local iwi and an open understory. Get rid of ALL pines on a thirty year time frame - leave a few as perch trees to attract birds and retain a vertical structure to the regenerating forest (ie don't just fell them all like on Tinakori hill)</p>		<p>Add a new policy 8.9.3.1 outlining the need for a long term landscape development plan for Mt Victoria which will integrate future landscape change, vegetation management and recreational activities.</p>	<p>accept</p>	<p>change as outlined</p>
	<p>We are in general support of the tenor of the document particularly with its intent to strengthen and increase the importance and prominence of the bio-diversity of New Zealand fauna and flora within the town belt. We are very fortunate to have world renowned endemic wildlife that draws visitors to our shores.</p>	<p>186</p>		<p>noted</p>	
	<p>What is needed now is a long term (200years) commitment to enable the native trees that we plant today on the town belt to reach maturity. This longer term thinking is evident in Botanic Gardens and Otari/ Wilton bush and needs to be extended to a greater portion of the Town Belt.</p>	<p>186</p>	<p>Have developed some longer term objectives to support this change</p>	<p>accept</p>	<p>change as outlined</p>
	<p>Analysis The branch applauds the integrity and thoroughness of the analysis of the ecology of the Wellington Town Belt as presented in sections 5.1 Historic Ecosystems, 5.2 Current ecological values and 5.3 Issues and Opportunities including the inclusion of karo as a common weed in 5.3.2 Pest management. The importance placed on ecological connectivity (p. 37) is particularly welcome and coincides with the branch policy on creating green corridors within the city.</p>	<p>186</p>	<p>Note that changes to the chapter involved Forest and Bird as one of the major contributors. Thanks for the help.</p>	<p>accept</p>	<p>see modified chapter</p>

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<p>Objectives The branch supports all the objectives listed in section 5.4, particularly the first points of section 5.4.1 “that the biodiversity of the Town Belt is protected, enhanced and functions as a well-connected system”, and of section 5.4.3 “that citywide ecological connectivity is improved and existing ecosystems enhanced”.</p>	186	see above		
<p>These objectives seem much more useful than the description of the Town Belt as “a hub of indigenous biodiversity” in the Guiding Principle (p.33). The term “hub” is used in relation to sports facilities in a similarly ill-defined way, but seems to mean something very different from the narrow, horseshoe shaped belt of natural landscape framing the central city, in which the focus needs to be on connectivity.</p>	186	see above		
<p>The objective of improvement of the “ecological resilience of the city” appears laudable, but could perhaps benefit from a description of what this might mean in lay person's terms.</p>	186	see above		
<p>Policies The policy of reversing the preponderance of exotic over native species is welcomed, but it is felt that this should be spelled out independently of the prioritization of its implementation (5.5.6 and 5.5.11). The branch welcomes the policy of involving community groups. Restoration of the original vegetation on the town belt is particularly important because of the potentially exemplary nature of work on land so easily accessible to the citizens of Wellington.</p>		see above		

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<p>The objectives and policies for ecology/biodiversity are generally supported. We agree that the Town Belt has the size and location to act as a major hub for biodiversity and improve the city's resilience and connectivity. The Town Belt's potential for resilience is more than an ecological benefit. Resilience is also critical in terms of resilience to environmental change, and social resilience for recreation, active transport and emergency management needs.</p>	204	Note that changes to the chapter involved the Centre for Sustainable cities as one of the major contributors. Thanks for the help.	noted	
<p>. We specifically support the objectives and policies for indigenous habitat restoration, but note that in moving to replace exotic trees by indigenous-dominated forest, the council needs to take the public with it. The Town Belt's exotic stands are valued by many Wellingtonians for their amenity, historical and cultural values and simply by being the vegetation that people grew up with.</p>	204	see above		
<p>. Regulating ecosystem services can be largely provided from exotic vegetation, particularly the tall, old, relatively little managed gum, macrocarpa and pine-dominated stands which constitute the bulk of exotic vegetation in the Town Belt. These stands tend to have reasonable native understorey diversity and offer good habitat to a range of native wildlife. Therefore, in view of the amenity and other values mentioned above, replacement of stands of exotic trees by native –dominated vegetation should be a gradual process, driven primarily by hazard considerations, and undertaken in a way that maintains ecosystem services.</p>	204	see above		

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<p>We note that many parts of the Town Belt can be managed to maximize carbon sequestration, not just those that are currently eligible for carbon credits. Policy 5.5.17 should recognise this as follows: 5.5.17 Manage all [new] forest areas, especially those [new] eligible for carbon credits, to maximise carbon sequestration for the city, prioritising areas of both carbon growth and biodiversity protection</p>	204	see above		
<p>Historic ecosystems In our experience the statement regarding birdlife in the Town belt that "the only numerous natives are fantail, greywarbler and silvereve" may have been true when the last management plan was written. But since then Greater Wellington council's pest control programme has had a beneficial effect on the Town Belt's native birdlife.. The Town Belt in Mt Victoria for example, one can see flocks of Tui in the gums around the Charles Plimmer Park area. Kingfishers are fairly common going by their calls and are breeding on Mt Victoria (if their burrows are anything to go by). This time of the year the Town Belt is ringing with the 'pipiwhareoa' calls of the shinning cuckoo and on still nights on Mt Victoria one can hear the calls of ruru/morepork which would also be breeding there.</p>	209	We will include this information in the updated chapter.	accepted	
<p>Page 33 In the first explanatory sentence in guiding principle remove the words "acting as a hub jar" and replace with "fostering</p>	215	This principle will be reworded	noted	
<p>Page 34 The statements in section 5.2 provide justification for retention of and inclusion of additional natural areas that assist in "providing corridors bringing nature into the city" as are highlighted in ecological connectivity comments on page 33.</p>	215		noted	
<p>Quality of natural environment (indigenous bush, views etc is more important consideration than total area set aside.</p>	29		noted	

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<p>We don't need to be too precious about which native plants existed in the area before the arrival of Europeans. It's OK to have Pohutukawa</p>	<p>48</p>	<p>Pohutukawa will remain on Town Belt for amenity and landscape plantings but will not be actively planted into indigenous habitats</p>	<p>noted</p>	
<p>My key concern is that I can not see any provision for the restoration of late successional and climax native plant communities into the Town Belt. As stated in my 1994 report, most of the native vegetation on the Town Belt is simple in structure and composition. Although twenty years have passed since I undertook my field survey of the Town Belt's vegetation that observation still holds. The Town Belt lacks the tree species that characterise mature (old-growth) native forest of Wellington. These species are: rimu, kahikatea, miro, matai, totara, pukatea, tawa, titoki, hinau, black maire, kohekohe, nikau, tree fuchsia, rewarewa, kaikomako, putaputaweta, northern rata* and pigeonwood. *(see para 11 on northern rata planting) Since I prepared my 1994 report on the Ecology of the Town Belt there have been 3 significant events that have a bearing on this issue: - effective possum control has been undertaken throughout Wellington City - some native bird populations have increased (tui, kereru) & some bird species have been reintroduced to Wellington (N.</p>	<p>49</p>	<p>Noted the assistance of this submitter in assisting with the revision of the ecology chapter.</p>		
<p>Most of the forest trees that are effectively absent from the Town Belt have seed that is dispersed by fruit-eating birds. Kereru (native wood-pigeon) are the principal dispersal agent of these fruit-bearing trees in mature native forest. Although numbers of kereru have risen slightly in Wellington following possum-control programmes, their population is too small to have any effect on regeneration of mature forest species beyond the remnants of old-growth forest that they preferentially inhabit. There is little to attract kereru into the Town Belt forests. The Town Belt lacks the food trees that kereru require and does not have roosting trees that kereru favour. The Council cannot rely on natural dispersal as the means to regenerate tall, complex biodiverse native forest on the Town Belt.</p>	<p>49</p>	<p>see above</p>		

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<p>The Draft TBMP proposes planting of tall tree species on Mt Victoria (policy 8.9.3.2). I support this; but there are many other sites suitable for enhancement planting of mature forest species on the Town Belt. The podocarp species, northern rata and rewarewa are fairly light-demanding and require decent-sized light gaps for rapid growth. The other species can cope with a degree of shading and may be planted within stands of young forest or shrub growth as long as they are sheltered from drying winds. It is not necessary to wait for late successional stages in which to establish tall tree species (see discussion in last para p.162).</p>	49	see above		
<p>Recommended policy to insert (somewhere within Policy 5.5.)</p>				
<p><input type="checkbox"/> Commence large-scale enhancement plantings of mature indigenous forest species throughout the Town Belt</p>		see above		
<p><input type="checkbox"/> Ensure follow-up care of plants is undertaken</p>		see above		
<p>My preference is that the Council acknowledge the much wider role the Town Belt has in providing various ecosystem services and functions. (The Draft TBMP identifies a number of these ecosystem services/functions: habitat for indigenous animals and plants, food for native animals, corridors for animal movement, storm-water control, sediment capture, soil-nutrient cycling, carbon sequestration, recreational space for people). 16. As ecosystems by definition include populations and communities, a more encompassing guiding principle gives a truer reflection of the value of the Town Belt to the City. Recommended Guiding Principle Section 5 <input type="checkbox"/> The Town Belt will support self-sustaining indigenous ecosystems</p>	49	see above		
<p>Recommended Policy to add (Policy 5.5.19) <input type="checkbox"/> Produce regular reports on ecological monitoring programmes to document trends & issues and to inform people</p>	49	see above		

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I believe a mixed approach to ecosystem renewal is important - that is, we should consider renewing "native ecosystems" and enhancing the "ecoforestry" quality of the belt - exposing it's productive character wrt forestry.	79	Both activites can take place on town belt. This chapter is proposing a focus in some areas on ecological habitat protection and restoration.	noted	
Increasing the indigenous vegetation alone is not enough. Other vegetations (including trees and shrubs) should also have a chance to prove their worth.	7		noted	
I strongly oppose removal of existing healthy large pines, eucalypts, redwoods etc. I strongly oppose spraying of any kind anywhere in Wellington let alone Town Belt. I strongly support planting of natives alongside/between/among and on bare land and letting natives come away beneath and around gorse.	82	see 1 above. Arboricultural approach as a first priority when managing trees - not forestry. There will still be a requirement to remove trees when the risk and costs of maintenance become too high.	noted	
As the fate of many of the pines etc. has shown, indigenous vegetation suited to the area and growing conditions appears to be the most viable long-term option. Except for most of the Botanic Gardens, the Town Belt should comprise an important part of Wellington's native bush.	84		noted	
see detailed submission which will be analysed separately	95	Noted the assistance of Wellington Botanical Society in the revision of the Ecology chapter. Many thanks.		
The Management Plan lacks emphasis on restoration of native forest including the vital podocarps/ forest giants, where suitable. It neglects to emphasis pest control which is essential to restoring native fauna. It allows for future benign neglect.	136	Chapter has been revised with a greater emphasis on the need for a mature canopy forest	noted	

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	Last town belt management plan resisted removal of pine trees in certain areas and these have become hazardous. make a fresh start with native revegetation focussing on podocarps and such rather than the typical native weeds like mahoe that are often planted where they would arrive naturally anyway. The planting of kaihikatea totara nikau etc near the top of majoribnank street is a good example of what should be done - lots of podocarps and species that will not naturally recover without wood pigeons	15		noted	
	There are some areas of the Town Belt where the Plan does not tell of Pest Control, Exotic Weed Control or other weed control. The Draft Plan needs to be broadcast so the neighbours of such areas will understand what they can do to help in these areas. Current Doctorate Studies indicate that N.Z. Podocarps amongst others need specific types of fungi growing on their roots to obtain sustenance or the seedlings die.	171		noted	
	The replanting of rata and to a lesser extent rimu, does not take into account the earlier vegetation: pukatea, manuka, kanuka, totara and rewarewa as well as miro and other berry fruiting trees that sustain native birds such as kereru and tui. For me and for most Maori, the relationship with birds is very important and I would like to see planting that encouraged the revitalisation of native birds in Wellington.	43		noted	
ch5	slowly remove exotics in favour of natives	22		noted	
CHAPTER SIX - Recreation					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan

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6.1 & guiding principle	for all citizens - not just groups	161	Community groups comprise groups of people who have similar interests and use the Town Belt in different ways to individual users for casual recreation. The range of facilities and spaces on the town belt needs to ensure everyone can access and enjoy it for their specific recreational purposes.	noted	-
2.7 & 6.4.3	maintaining pedestrian access - to and from schools is important if any of the former Town Belt lands are returned.	132	The Council would work with MOE to ensure any return of Town Belt lands did not change or restrict access to schools. This is not part of the criteria for return, rather a point for discussion and agreement at the time of return.	accept	-
6.4.3	Track access - no policies to encourage Maori groups to encourage access eg publicity campaigns at marae, holding hangi and gala days etc	43	Policies about getting people active are included in the upcoming Open Space and Recreation Framework and are much broader than just the Town Belt.	noted	-
3.2.2.2 & 6.4.3	We need Council support to deliver and maintain trails that are built	146	Additional resourcing for new tracks is part of deliberations during the LTP. Proposing new policy about supporting volunteers	accept	Change policy 3.2.2.1 by adding ".....shall be encouraged and supported ."
	Will not be able to support all requested uses and activities	215		noted	-
6 & guiding principle	for all citizens - not "for all to enjoy"	165	see 161 above	reject	-
4,6 & DI	oppose legislation/policies that allow council to have 'flexible powers'; 'commercial activities & events' & "construction of buildings considered "desirable" to decision makers"	100	SEE RESPONSE Drafting instructions	noted	
6.2 & DI 11.3	further discussion on whether Council should adopt definition of recreation in Reserves Act. Disagree "emphasis ... retention of open spaces & outdoor recreation activities. Bias - favours informal recreation - does not promote balance between "natural areas ... with the demands from organized sports"	111 & 216	SEE RESPONSE Drafting instructions	noted	
6.2 & DI 11.3	1995 plan - Reliance on 1839 was invalid. Reliance should be on Reserves Act - permits sports activities, excludes childcare/education from recreation reserve	126	SEE RESPONSE Drafting instructions	-	-

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6.1 & DI 11.3	"recreation" should be universal term used for all activity that people engage in for enjoyment including children playing in a creche, adults making pots, directed - organised, undirected - spontaneous (examples)	32	SEE RESPONSE Drafting instructions	noted	-
6.1 & DI 11.3	recreation - definition hasn't change over time	182	SEE RESPONSE Drafting instructions	noted	-
6.1 & DI 11.3, 7.3	activities that are not recreation - zoo, spca - both activities will allow public to use	215	SEE RESPONSE Drafting instructions	-	-
6.1 & DI 11.3, 18	to leave recreation to interpretation to Councillors & officers is not a good idea. No Commercial operators. Sports teams are tradable	77	SEE RESPONSE Drafting instructions	noted	-
6.1	lots of people enjoy the TB - scenery & amenity	182	already identified in the values to be added to Chapter 1.	accept	
6.1	need to connect to nature. Peace, place connection, restorative. Natural world challenges us. Personal, emotional connection. Not commercial. Organised sport great but no connection with nature	194	Add in section at end of 6.1 about connecting with nature and the positive effects of natural areas on mental health.	accept	Add in section at end of 6.1 about connecting with nature and the positive effects of natural areas on mental health.
6.1	make it clear actual total area of land occupied by recreation & community groups	215	leased area is mentioned in 6.1. We will add in the total area of Sport and Recreation Parks into 6.4.1.	accept	leased area is mentioned in 6.1. We will add in the total area of Sport and Recreation Parks into 6.4.1 (=58.5ha)
6.1	include impact/benefits interaction with natural envi on mental health	215	this is mentioned in 6.1.	noted	
6.4.3 & 6.6.17	more areas for dogs to be off leash	73	will be considered when review Dog Policy in 2014	noted	-
6.4.3 & 6.6.17	dogs are a problem for walkers	257	will be considered when review Dog Policy in 2014	noted	-
6.4.3 & 6.6.17	dogs off leash - concern for animals living on ground eg lizards. Signage about keeping dogs on lead valuable	186	will be considered when review Dog Policy in 2014	noted	-
6.4.3 & 6.6.17	few places in TB where dogs can go. Would be good to have dog walking connections between sites, as long as clearly signposted for other users. Te Ahumairangi Hill summit site good - long area	200	will be considered when review Dog Policy in 2014	noted	-
6.4.1	underutilisation of some facilities - should require to vacate or reduce premises so land returned to public space or share them, eg Victoria Bowling Club.	109	regular assessments during lease, also conditions in lease as per the Leases Policy for Community Groups.	noted	
6.4.1 & 6.4.2 & 6.6.5	Should not be able to run commercial activities eg cafes. Open to exploitation. Not permitted under the Deed. Not consistent with 6.6.5.	109	6.6.5 deals specifically with Sport and Recreation clubs. Leases for commercial activities such as cafes are covered under the rules (9.4.3)	reject	

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6	Plan needs to allow for plans Leasee may wish to implement	111 & 216	plan has identified some improvements that Clubs have discussed with Council eg Hockey, Wakefield Park. Policies	noted	
6.4.1	Tennis Central want to be involved in any discussions on future of tennis courts facilities on TB	111		noted	-
6.4.1	no specific ref to fencing in plan (table). Fencing occurs year round, caters for a number of children that are not into team sports.	161	Included in list of indoor sports in table 6.4.2.	accept	Prepare a table showing range of non-sportsfield sports/indoor sports using TB eg fencing, badminton.
	Share clubrooms with many community groups. Day time = downtime - have tried to promote space to community groups - but usually want to use building in evenings	161	-	noted	-
6.4 & DI	no more land leased/unavailable for general use	127	SEE RESPONSE Drafting instructions	-	-
	no leases for selected people only	182	Leases Policy - not individuals - but groups get lease. Deed allows leasing	reject	-
6.4.2	issue of sustainability of groups & opportunities for sharing facilities/amalgamation appreciated. Need proactive approach - maximise use of existing facilities to protect TB values	215	-	noted	-
6.6.4	agree benefits of sharing facilities (carparks, changing rooms, meeting rooms). 'one-size fits all' facility does not suit everyone. All sports have specific requirements. 'sportsville' model naturally lead to groups wanting to develop facilities to meet collaborative needs. Some sports are more flexible. Policies will stop willingness or discussions to keep moving forward	244	look at defining sportsville and recreation hubs. Note process/criteria.	partly accept	Define Sportsville and Recreation hubs in section 6.4.1 and 6.4.2
6.6.4	agree benefits of sharing facilities (carparks, changing rooms, meeting rooms). 'one-size fits all' facility does not suit everyone. All sports have specific requirements especially at elite level (playing surface, lighting, shelter, indoor). Some sports are more flexible. All positions must be considered	111 & 216	look at defining sportsville, recreation hubs. Note process/criteria. Have to give reasons why can't have shared facilities	partly accept	Define Sportsville and Recreation hubs in section 6.4.1 and 6.4.2
6.4.2	excessive noise for neighbours (Mt Vic bowls) bowls don't need sound equipment. Object to ideas, schemes, plans to violate original deed. Loopholes must be blocked	253	check rules (ch9) to identify activities that are 'unacceptable' on Town Belt. Need to incorporate in conditions of lease that are closely monitored.	noted	

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	Badminton has expanded a lot in last 10 years. About 17-20,000 people use during the year. Tournaments, training for children. Day time = downtime	216	-	noted	-
6.4.2 & 9	TAB facility, drunken parties - not what TB is for. Bowling club has legal opinion saying it can keep TAB facility - but removal condition of lease	241	SEE RESPONSE CH9	-	-
6.4.3	Horse riding - run afternoon once a month for children. Positive relationship with other users	39	-	noted	-
4.3.16 & 6.4.2	exception to removal - structures that have cultural, architectural, historic or archaeological significance	103	we will consider the significance of any building that is identified for removal because 1) no suitable use can be found or 2) the building is dangerous. We will discuss with	accept	amend 4.3.16 to note assess historic significance of building before considered removing it
6.6.4	mixed use desirable. There are buildings in city (non TB) that could be used too eg schools	103	alternative sites - first assessment carried out. Applicants will have to provide reasons for why this is the best location for the activity	noted	-
8.6.4.2 & 8.6.4.3	must be public consultation on any changes at Berhampore. Land should remain parkland, not used for mountain biking	104	see response Ch 8. any major changes to the golf course will be subject to public consultation	noted	-
6.6.2	land gifted to citizens. Maintain by not building more facilities for subset of citizens	106	Policies encourage best use of existing facilities and restrict where new buildings can be constructed. There will be an ongoing need to redevelop facilities and this may include extension of existing or in some cases new facilities	reject	-
	organised sport developments have reduced natural areas & limit type & quality of informal recreation	107 & 44	The policies in the plan will limit future increases in formal sporting areas but will allow some development within the footprints. Most of the sport and recreation parks were developed over 50 years ago, apart from the recent development of Te Whaea which was on the site of a car park.	noted	-
	don't add more for sport	108	-	noted	-
6.6.4	support co-location - must take place within footprint no larger than currently occupied.	109	Management Plan identifies areas (at some of the sport and recreation parks) where more development may occur - will allow for some expansion within existing footprint of Park.	reject	-
	1995 plan - has policy about removing surplus structures. Should retain policy	109	included in 4.3.16 - should we repeat/refer to in Ch 6	noted	Note the policy in the landscape section about structure removal after policy 6.6.6
	playing fields often empty except weekend. Don't see a need for more space	10	objective 6.5.4 recognises this and proposes to maximise use of existing facilities by various means.	noted	-

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6.6.2	disagree development of existing building be limited to existing footprint	111 & 216	The development of existing building is limited to the footprint of the building or the Sport and Recreation Park it sits on. The restriction will apply mainly to buildings that sit by themselves such as the Wade Street Tennis Club.	reject	
6.6.3	criteria may be too restrictive - especially existing lessees	111 & 216	The Policy and criteria recognise the need to consider carefully any further developemnt on Town Belt and to restrict it to existing Sport and Recreation Parks. Applications to extend footprint will be considered	reject	-
	keep to a minimum. number of sporting facilities within city	112	-	noted	-
	do not approve any sport or building should be on TB	114	Public recreation ground - but focus is on informal sport. Not contrary to the Deed. The Deed does not specify whether buildings can be built or not. Formal sporting activities have occurred on the Town Belt since Newtown Park opened in 1881.	reject	-
	don't want screaming fans, grandstands, goalposts. Want quiet reserve land	114	Policies encourage best use of existing faciities and restrict where new buildings can be constructed. There will be an ongoing need to redevelop facilities and this may include extension of existing or in some cases new facilities	noted	-
	structural development (buildings) maintained but not added to. Unused should be re-invigorated	116	some development of buildings on Town Belt (eg extension) is likely to be needed. Removal is covered	reject	-
	limit development of facilities that are single purpose, only useable by a small user group	117	Any application for development of existing facilities would need to identify the demand for such a redevelopment. Part of this would be how well used it would be and the range of activities/users.	partly accept	develop criteria to assess applications
	more sports facilities	121	all applications for sporting infrastructure will be assessed against existing Council policies and the specific Town Belt policies such as considering alternative sites (non-Town Belt) first, limiting development to sport & recreation parks, impacts on environment and so on.	noted	-
	development of existing should be possible - as long as doesn't encroach on areas widely used and enjoyed. If will encroach - clubs benefiting from expansion should be required to replace any areas lost as a result	123	Assessment would look at the effects of the development including on other recreational activities (Policy 6.6.3).	reject	-

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	support limiting development on TB. Do not support limiting development on non-TB land	126	-	noted	
	core purpose open space/informal recreation. Good idea to not develop any further or allow elite sport	127	Elite sport will need to complement community use. This could be the time of use, the role of elite sport in the development of community sport and junior programmes and so on.	noted	
	do not want any more TB built on or leased	127	SEE RESPONSE Drafting instructions	noted	-
	any development should be encouraged - ultimate outdoor capital	130	all applications for sporting infrastructure will be assessed against existing Council policies and the specific Town Belt policies such as considering alternative sites (non-Town Belt) first, limiting development to sport & recreation parks, impacts on environment and so on.	noted	-
	sports facilities - cost a fortune, destroy whatever underneath - compare with MTB	131	Plan outlines opportunities for both formal and informal sport	noted	-
	provision of sporting facilities important to education/ wellbeing of wider community. Importance of informal recreation and role of TB.	132	-	noted	
6.6 & DI 16.1 & 19.3 & 20.3	neither should Council have right to construct or authorise construction of buildings. Should contain words "no additional land be developed for organised recreational facilities (formal recreation) in the Town Belt"	134	SEE RESPONSE Drafting instructions. Plan allows for some additions to meet sport demands - assessment carried out against TB policies	reject	-
	no more land should be lost to building	136	plan identifies natural areas and other areas where more development could occur	noted	-
	support access for organised sport - benefits residents	139	-	noted	
6.6.3	oppose usage growing in future. Wide range of sports grounds in City - don't need to encroach on TB	139	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. Plan outlines that any new developments limited to footprints of leased areas and/or Sport and Recreation Parks. (Policy 6.6.2). It is noted that the Town Belt will continue to provide a large number of sportfields to cater for existing and future demand.	noted	-

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6.6.4	would like to see facilities utilised as much as possible before new facilities are constructed. Do not object to upgrade to ensure they are utilised.	141	Policies encourage best use of existing facilities and restrict where new buildings can be constructed. There will be an ongoing need to redevelop facilities and this may include extension of existing or in some cases new facilities	noted	
	No not support new facilities that would impact on track network	141	This should not occur given the policies around restrictions on development to within existing Sport and Recreation footprints.	noted	
	current extent should be limit. Land-hungry, create ecological barren areas. Socially vital - but need to balance this & protect ecology/trees	149	Policies encourage best use of existing facilities and restrict where new buildings can be constructed. There will be an ongoing need to redevelop facilities and this may include extension of existing or in some cases new facilities	noted	
	formal sporting facilities can exclude public access - opposition to founding purposes	157	Formal sport and associated infrastructure is not contrary to the Deed. Formal sport can restrict access during play. However there is lot of informal use when games are not being played.	noted	
	limit organised sport so no further encroachment should occur	15	Organised sport is limited to within existing Sport and Recreation park footprints	noted	
	make current facilities useful - rather than creating more	164	-	noted	
	by limiting to only current sports will prevent being able to cater for new sports. Limit usefulness of overall complex (Hataitai Park)	167	There are no restrictions on the development of new sporting activities provided they comply with the policies around facility development.	noted	-
	buildings on TB are amongst ugliest buildings in the city	176	policy on design	noted	
	no more land should be leased	191	SEE RESPONSE Drafting instructions	noted	-
	keep to existing area	193	Policies encourage best use of existing facilities and restrict where new buildings can be constructed. There will be an ongoing need to redevelop facilities and this may include extension of existing or in some cases new facilities	noted	
4.3.16	find uses before propose removal of buildings	177	covered in Leases Policy for community and recreation groups	noted	-
	buildings should have generous verandahs - shelter from weather	177	policy on design. DP review - opportunity to review rules on buildings on Open Space C zoned land (Town Belt)	noted	-
	buildings have potential to increase city's resilience during natural disasters. signpost	177		noted	-
	ensure bike tracks & outdoor public access bike facilities is not included as "sporting facilities"	181	There are separate policies on track (access) network	reject	-

	sports facilities - rarely enhance ecological value	186		noted	-
	indoor sports facilities not appropriate.	186	policy favours outdoor recreation. Any application for indoor activity/facility - first assessment - alternative sites. Applicant has to give reasons for why the activity needs to be on TB	reject	APPENDIX 2
	buildings should be removed wherever possible when become vacant or dilapidated	186	policy in ch4 & leases policy	noted	-
6.6.3	other spaces in city to provide facilities	187	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. However many sporting activities have taken place on Town Belt for over 100 years and will continue to do so.	noted	-
	difficult to grow our sport without further development of facilities	196	Plan does not prevent extensions to existing facilities. . Assessment on whether it is best site for facility.	noted	-
6.4.1	informal recreation activities regularly take place on facilities primarily used for organised sport	196	Yes this does occur	accept	add text in 6.4.1 to note that this occurs
	issues include: visual impact & loss of amenity; noise impacts; is it exclusive use; consider alternative sites	197	The plan does have a series of criteria and an assesment process. This could be clearer to follow.	partly accept	develop criteria to assess applications
6.6.3	WCC should encourage - work cooperatively, build multipurpose areas on community or crown owned land. So demands from organised sport to not overwhelm	203	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. Wellington has limited flat land available for development.	noted	-
4.3.16 & 6.6.3	Cannot see where plan encourages removal of buildings where co-location has not worked. Move emphasis from Council to clubs - have to demonstrate activity benefits community & encouraging co-location & co-operation. Need 'first principle review' - building should not be there. Eg Badminton should have been encouraged to go to recreation centre in Kilbirnie	203	Policy about removing structures in Ch4 (4.3.16) and also in Councils Leases policy for community and recreation groups. Process will be developed - key questions that get asked about proposals. The Plan identifies that organised sport and associated infrastructure is a long standing historical use of Town Belt.	partly accept	develop criteria to assess applications
	Badminton Hall and NZTA/PWA ???	203	pwa - any compensation deal between affected party (badminton) & NZTA	noted	-

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6.6.2 & 6.6.3	development of small 'new' recreation areas may be justified if serves as important recreational need. Term of plan - should be able to accommodate within existing footprint	204	intend to focus new development on the sport & recreation parks identified in this plan - although there will be no further development in Kelburn Park etc	noted	-
6.6.2 & 6.6.3	add " sporting, recreational and club facilities	204	agree	accept	add " sporting, recreational and club facilities
6.4.1	some sportsfields in poor condition. More development of artificial surfaces could mean retirement of sports field - used instead for dog exercise areas, passive recreation, indigenous vegetation, community gardens	204	There could be an opportunity in the future for some low quality sportsfields to be retired and converted to other uses. This will depend on long term demand and increased provision in other parts of the network	noted	
SI	Council could require as part of lease on TB, substantially reduced membership fee to any family with Community Services Card	205	This would need to be a policy decision as part of the Leases Policy for Community Groups. Not a policy for inclusion in this plan.	reject	
SI	Not enough for teenagers - skate board park at Adelaide Rd great start - don't waste money painting over graffiti), mountain bike tracks. More of these & other physical casual stuff - eg on east side of Golf Course	205	Provision for youth activities will be carried out as part of the Suburban Reserves Management Plan. Could link the community facilities provided within the Town Belt to local communities.	partly accept	Add short section to 6.4.5 to emphasise that the Town Belt does provide many neighbourhood spaces including playgrounds and skateparks and these need to be considered when doing an overall assessment of the local community needs.
6.6.3	Exhaust all non-TB options first to preserve TB character	205	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. Wellington has limited flat land available for development.	noted	-
SI	area covered by flora - needs to remain without structures for organised sport	20	The plan identifies existing Sport and Recreation Parks and areas for informal activities/vegetation. This work will be further developed as part of the Ecology objectives and policies which will identify the key areas for ecological restoration.	noted	-
6.6.3	opposed to provision of organised activities that are not passive. Purchase non-TB lands. Unacceptable to reduce amount of passive open space enshrined in TB - to meet needs of population growth	213	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. Development will be limited to the existing footprints of Sport and Recreation Parks.	noted	-
SI	Oppose new or extension to existing buildings	213	assessment will be carried out to see if application complies with policies in plan. Plan identifies areas where more development could occur eg Hataitai Park	noted	develop criteria to assess applications

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6.6.7 & 6.6.9	develop cycling/walking paths to encourage more use - gradient, sealed, lighting	116	The current policies identify the need to improve access and use. The track standard will be assessed on a case by case basis. Generally tracks on Town Belt will not be lit or sealed except where they provide short, safe routes between streets	noted	
6.4.3	maintain & expand track network - reduce motorist transport	122	-	noted	-
6.4.3	more mountain bike trails	137	-	noted	-
6.4.3	all new walking & cycling tracks are welcome	138	-	noted	-
6.4.3	track network needs to include graded tracks - too many up & down	15	covered in policy 6.6.13, 6.6.7	noted	-
6.4.3 OR 2.7 ???	regularising road alignment to improve access to TB: include cycle facilities (bike boxes & cycle lanes). Ruahine St is a barrier preventing people from accessing TB	177		noted	-
6.4.3	need for family friendly tracks. Support increase to enable cycling off road into Town	181	covered in policy 6.6.14	noted	-
6.6.8	thought needed on use of walking tracks by MTB, significant amount of damage eg Te Ahumairangi	193	assessment of environmental damage - part of OSAP	noted	-
6.5.7 & 6.6.7	potential to facilitate active transport should be specifically recognised in MP. Aware of many tracks in TB that are not maintained in good enough condition to be used as potential walking & cycling routes. Funding issue rather than policy. 6.5.5 ... increasing a range of physical ... providing active transport routes and access ... 6.6.7 signs, and improving the surface and/or by reducing ...	204	The proposed changes fit with the intent of the chapter to increase access into and through the Town Belt.	accept	change objective 6.5.7 as proposed. Change policy 6.6.7 as proposed.
	Plan in conjunction with routes & open spaces contiguous or close to TB so tracks can form part of a network	204	covered in policy 6.6.9	noted	-
	case for easy access to VUW and schools. Collaborate with Living Streets and Cycle Aware Wellington	204		noted	
	promote city where easily and safely bike, walk, scoot, skateboard to work & school. Amazing views from network of walks throughout TB	205	city-wide need. Covered in part in 6.6.16	noted	-
	encourage non-motor vehicle transport to, from, inside TB	214	Improved signage and information on key routes will encourage increased non - motorised access.	noted	-

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	encourage shift to active modes & public transport. Won't happen unless pleasant walking/cycling routes that provide access to all destinations & allow direct connections between bus routes	255		noted	-
6.4.3 & 8.3.2.2	support keeping existing access ways eg Boyd Wilson Strip	103	Proposal does provide for the ongoing security of access especially as VUW have confirmed they do not wish to acquire the access.	accept	-
6.4.3	every route has value in network	255	-	noted	-
6.4.3	City to Sea walkway by-passes Polhill Gully & Aro Valley, should be routed - reduce road travel & allows walking through TB	107 & 44	The current route of the City to Sea Walkway passes through Town Belt and links with Tanera Park. The proposed changes would not add to overlal track and experience. Best to see this as an option to access the Outer Green Belt.	reject	-
6.4.3	signs need upgrading (Northern, City to Sea)	107 & 44	Passed onto track team	noted	-
6.4.3	unclear in plan criteria determining dual use. Plan unclear if City to Sea WWY is dual use or single use	107 & 44	Open Space Access Plan has criteria and list of those tracks that are closed The City to Sea Walkway is closed to Mountain bikes for its total length. This is noted on page 50.	noted	
6.4.3	number of informal track users is high so should be catered for	68		noted	
6.6	new policy "wherever practicable, the tracks within the Town Belt that are closest to the inner city and most accessible to people of all ages and abilities must be designated as being exclusively for pedestrians"	77	Council policy is to have dual use tracks. New tracks are designed to cater for dual use. Mountain bikes are banned from some tracks (listed in OSAP) - after assessment which considers environmental damage and user conflict.	reject	-
6.4.3	new MTB tracks can be enjoyed by more people and provide alternative routes not on road	9	-	noted	-
6.4.3	walking tracks do not cater for less able person. Excellent walk at Karori Park could be replicated eg Wakefield Park	91	As Park upgrades occur an assessment of other uses and activitie within the park will be made.	noted	-
6.4.3	use of walking tracks by cyclists reduces enjoyment of walking	233	-	noted	-
6.4.3	pleased about Island Bay/Newtown link and Island Bay to CBD commuter link. Urge more links developed between TB & suburbs.	243		noted	
6.4.3	concern about MTB on narrow tracks	120	Mountain bikes are banned from some tracks (listed in OSAP) - after assessment which considers environmental damage and user conflict.	noted	-

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6.4.3	Wellington MTB community shown important role volunteers can play in maintenance/development and utility of land on Town Belt .	117	recognise volunteer effort building/maintaining tracks in Ch 3 & Ch 6	accept	add extra sentence into section 6.4.3 to recognise the volunteer contribution to track development.
6.4.3	Signage needed on dual use track if priority to walkers, MTB should be courteous, expect others.	117	Will assess signage as tracks upgraded.	noted	-
6.4.3	Design trails for speed control	117	New tracks are designed to minimise user conflict and manage speed.	noted	-
6.4.3	Makes sense to separate uphill riders/walkers from downhill MTBs,. Not possible everywhere	117	see 141 below	accept	see 141 below
6.4.3	MOU with Council around building tracks and maintenance - veg clearance	117		noted	
6.4.3	Council employs 2 staff - only able to keep up with maintaining primary track. Some tracks are difficult for groups to maintain eg gravelling = tracks wear out & need re-gravelling. Amount of use of some tracks = more maintenance needed	146 & 141 & 68		noted	-
6.4.3	little mention extensive use of TB by MTB	10	There is mention in section 6.4.3 of the use of mountain bikes on Town Belt particularly Mt Victoria	reject	
6.4.3	how involved volunteer groups can support & enhance TB. Groups support Council with aspects of track maintenance	117	recognise volunteer effort building/maintaining tracks in Ch 3	accept	Add in another short section in 3.2 to outline the wide range of activities these groups are involved with including track building.
MTB	do not support mountain biking at Te Ahumairangi - damage track, unsafe for pedestrians	120	see response Ch 8	noted	-
6.4.3	more focus on MTB - plan seems to downplay sport. Amount of \$ put into sport. MTB trails falls extremely short. Contributes to tourism	11	The plan does mention MTB as a major activity (6.4.3). Could note the importance of mountain biking in Wellington and the role of the TB.	accept	change order of activities in chapter 6 by putting informal sport first. Also increase info on mountain biking at the end of section 6.4.3.
6.4.3	show off MTB & running tracks to overseas family & friends	125	-	noted	-
6.4.3	Happy to be part of maintenance group	125	-	noted	-
6.4.3	support increased access for MTB	130	-	noted	-
6.4.3	MTB fast growing sport - fitness, sport, cultural, envi values	131	-	noted	-
6.4.3	more trails for bikes - some exclusive use	135	agree - should mention	accept	see 141
6.4.3	need sealed cycleways for children, recreation cyclists & commuters	135	future commuting routes will be identified and constructed to a high standard. One option will be to seal some of these routes based on use and overall cost.	noted	

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6.4.3	pleased MTB permitted activity in plan. Growth in MTB positive to health & quality of life.	141	-	noted	-
6.4.3	Ready access to trails attracts MTB to live & work in city.	141	-	noted	-
6.4.3	Volunteering activity important resource & provides opportunities for stronger sense of stewardship & community	141	recognise volunteer effort building/maintaining tracks in Ch 3 & Ch 6	noted	see 117 above
6.4.3	various groups develop & maintain dual use & single use trails in city	141	see above	accept	add comment to 3.2 - currently groups involved in track construction and maintenance on TB as well as revegetation projects. Building dual use tracks for all and some mountain bike only tracks where user safety is an issue.... eg downhill
6.4.3	dual use not always best option in high use areas. Mt Vic - created MTB only tracks to reduce user conflict	141	Should identify that in some places dual use does not work best but mountain bike only tracks can work best.	accept	see above
6.4.3	many MTB active in revegetation & regeneration projects	146	recognise volunteer effort building/maintaining tracks in Ch 3 & Ch 6	accept	see 117 & 141 above
6.4.3	support equity of access & appreciate MTB policies in plan	146	-	noted	-
6.4.3	sustained levels of volunteer effort in MTB community to develop & maintain tracks benefits all TB users	146	see above	accept	see 117 above
6.4.3	few NZ cities have diverse range of trails so close to town centre, used by families, dog walkers, national mTB & running events & lots of informal activities	146	-	noted	-
6.4.3	support dual use as well as specialist MTB facilities eg 4X course & Super D course & kids skill area	146	-	noted	-
6.4.3	survey of MTB community - MT Vic is popular for commuting. Safe & preferable to busy road. TB link to many trails. Appreciate riding long distances.	146	-	noted	-
6.4.3	Recommend development of other off-rd community routes in TB eg Berhampore	146	thank you for suggestion. Passed on	noted	-
6.4.3	unique venue for MTB racing. Support continued access for events - minimal disruption to public & significant benefits to City.	146	-	noted	-
6.4.3	all these activities (mtb) are compatible. Any perceived or real user conflict can be managed appropriately to benefit all	146	-	noted	-

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6.4.3	thank Council for allowing people to 'build local' MTB trails. Built-to-last world-class tracks. Nearly all are also used by runners and walkers	148	recognise volunteer effort building/maintaining tracks in Ch 3 & Ch 6	noted	see 117 above
6.4.3	passive recreation focus of TB	15	-	noted	-
6.4.3	concern proposals to develop tracks & walkways for multiple users. Mt Vic = warren of tracks for MTB. Maintenance = more 'user friendly' - erodes what makes TB special. Graveling etc makes area bland. Oppose MTB creating more tracks at Mt Vic. Ban from tracks in central city - tear up tracks, conflict with others. Support MTB outside central city	164	Mountain bikes are an allowed activity on Town belt and in particular Mt Victoria. It is proposed to better manage this and other activities and their development on Mt Victoria through the development of a long term masterplan.	noted	
6.4.3	plan misses opportunity to grow trail running & MTB at TAH	169	Trail running is an allowed activity on Te Ahumairangi Hill. .	noted	
6.4.3	ensure plan makes it clear that bike tracks are not defined as 'sporting facilities'	181	There are separate objectives for sporting facilities and tracks.	noted	
6.4.3	more MTB tracks. Promotes exercise	207	-	noted	-
6.4.3	continue to develop & preserve MTB trails - great asset	252	-	noted	-
6.6	support MTB policies	25, 29	-	noted	-
6.4.3	development of single track solely for MTB help to reduce conflict. popular 55% of trail users regularly used Mt Vic. 40% Polhill reduce conflict with other users. Proximity to city & professional design & build	29	-	noted	-
6.4.3	recognised MTB destination, great place to live	29	-	noted	-
6.4.3	hopefully allow more bike specific tracks	50	agree should be mentioned. see 141 above	accept	see 141 above
6.4.3	more trails excellent tourist attraction		-	noted	-
6.4.3	would like to see 2 wd shuttleable downhill specific tr on council land		Idea passed onto officers	noted	
6.4.3	MTB - why live here & recommend friends should to	51	-	noted	-
6.4.3	like measures to reduce conflict between walkers & bikers	53	-	noted	-
6.4.3	good to have tracks for commuting to	53	-	noted	-
6.4.3	more riders issuing TB	54	-	noted	-
6.4.3	allowing MB excellent thing	65	-	noted	-
6.4.3	retain & enhance area for MTB	66	-	noted	-
6.4.3	keen MTB - more please	67	-	noted	-
6.4.3	support MTB allowed user of TB	68	-	noted	-
6.4.3	funding for track development too small compared to other sports	68		noted	-
6.4.3	recent development of MTB/commuting tracks great initiative	80	-	noted	-

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6.4.3	impressed with new MTB tracks. Bush can be enjoyed by more people - alternative routes that don't rely on roads	9	-	noted	-
6.4.3	build more cycle tracks	21	-	noted	-
6.4.3	support proposal maintain natural area/informal recreation/ sport	21	-	noted	-
6.4.3	plant tree for every metre of track built	146	see 141 above - Acknowledge in 6.4.3	accept	see above
6.4.3	economic impact of MTB	146	Acknowledge in 6.4.3 - tourism	accept	mountain biking - popular with visitors
6.4.3	moved here - how close bush was to city & MTB	141	-	noted	-
6.4.3	trail building - - develop new social network	141	-	noted	-
6.4.3	Council needs to supply resources to rangers & track team - volunteer groups need this support to deliver trails that are built.	141		noted	-
6.4.3	Bulk of trails being built by volunteers are multi-use. Only a few cases MTB only tracks	141	see 117 & 141 above	accept	
6.4.3	MTB relatively new sport - we respect/acknowledge access to tB	141	-	noted	-
6.4.3	need to minimise maintenance by using gravel. Difficult for volunteers to gravel tracks	68	maintenance - passed onto DH	noted	-
6.4.3	Informal use of tracks can be high - Council track counters. Informal use needs more focus & redirection of budget away from formal recreation	68		noted	-
6.4.3	MTB provides exercise & accessible tracks	68	-	noted	-
6.4.3	have pedestrian only access - speeds of bikes can be dangerous	161	see 141 response	noted	-
6.4.4 & 9.5.3 & 9.6 ?	support community gardens & orchards - but not individual plots. Source of pride. Gardening is a recreation activity & effective way of contributing to community health & development	103	look at definition used for CG. Need to emphasis that TB is not to be used for individual plots	Accept	strengthen section 9.5.3 of Management Plan by stating that these are primarily for not-for-profit community use and not to be sold for commercial or private gain, and there will be no new private allotments
6.4.4 & 9.5.3 & 9.6 ?	CG encourage community access & use of TB for recreation, promote conservation values. Education contributes to conservation, sustainability & recreation	108 & 143 & 147 & 162 & 194 & 57 & 71 & 85	envi educ. Clarify what is acceptable & what is not re education on TB. Not-for-profit/to cover costs. Ban commercial or formal education providers	partly accept	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.
6.4.4	CG&O should be limited. Experience shows can be neglected become unsightly	108		noted	

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q	sport fields appear underutilised. Create edge for spread of noxious weeds. More CG, native reserve areas used for environmental education facilities - increase city's food security & envi awareness	129	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.	partly accept	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.
6.4.4	preferable more edible/useful plants close to city - future transport & food production costs. Nut trees, fruits, berries, mushrooms for wild harvest. Have indigenous veg on steep slopes - not suited for food production	147	-	noted	-
6.4.4	support setting aside space for CG beside or within tB	147	-	noted	-
6.4.4	food growing or gathering is an activity support guiding principles by providing a wider range of activities carried out by a wider range of people.	162 & 170	-	noted	-
6.4.4	people are wanting more hands on activities which support natural connection. TB does this	162	-	noted	-
6.4.4 & 9.5.3 & 9.6 ?	more envi education, CG & food growing activities - horticulture, how to grow workshops	170	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.	noted	
6.4.4	Local goods environmental, health & community benefits as vital. TB accessible green area - perfect place for education & hands on activities & learn about local food	170	-	noted	-
6.4.4 & 9.5.3 & 9.6 ?	want to see environmental education included	170	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.	noted	
6.4.4 & 9.5.3 & 9.6 ?	more environmental education & allowance made for certified environmental education eg horticulture classes to be run	173 & 85	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.	noted	
6.4.4	CO in Berhampore with licence renewable on 3-yrly basis. Limited amount of volunteer time to work on applications. Anything that makes process easier or less frequent would be good	180	Council would look to lengthen the term of the licence (eg 5 yr term) if all conditions are met by the group. Recognises commitment of group	noted	-
6.4.4	Opportunity to come together, co-operate, produce food production & invest in community project	180	-	noted	-

6.4.4	foraging in TB - like having a big backyard ...	205	-	noted	-
6.4.4	member of Berhampore CO group. Great to have more CO plantings & CG so Wellingtonians are able to row more healthy food locally to share. Water supply important	205	-	noted	APPENDIX 2
6.6.18	"opportunities provided in all cases the use of Wellington TB land for a community garden must not involve any input of WCC resources contributing to development, maintaining any approved community garden and that all produce therefrom shall be freely available to all with sake, barter, gifting or other commercial transaction for produce being prohibited "	215	WCC supports community gardens on public land. The Wellington City Council Guidelines for Community Gardens outlines assessment criteria and the process used to assess applications. The Management Plan will contain policies on Community Gardens and orchards on Town Belt that need to be considered during assessment of applications. Add "not-for-profit", open to public etc. The Council provides grants for community gardens through its community grants scheme.	accept	
6.4.4 & 9.5.3 & 9.6 ?	support CG on fringes of TB but do not support "individual plots"	230	look at definition used for CG. Need to emphasis that TB is not to be used for individual plots	Accept	see 103 above
6.4.4	concern CG&O if increase in carparks required	36	-	noted	-
6.4.4	more CG with better access near town centre	55	-	noted	-
6.6.20	"maximum of two years, with six-monthly inspections to ensure compliance with the conditions of the licence". CG&O can quickly descend into neglect or be regarded as private domain or both. Inspections would ensure special privileges are respected	77	A licence will deal with issues of compliance and length of term.	reject	
6.4.4 & 9.5.3 & 9.6 ?	TB has role in environmental education & urban agriculture - support policy that enables this mandate	79		partly accept	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.
6.4.4	keen to see more fruit trees & orchards.	83	-	noted	-
6.4.4 & 9.5.3 & 9.6 ?	Environmental education, horticulture education, community run education eg permaculture, natural foods, natural education. Eg Education Outside the Classroom (EOTC) programmes run by schools & workshops by Innermost Gardens.	83		noted	

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6.4.4	CG community interaction with land & with individuals. Provide sustainable education hubs for people to learn how to grow their own food	83	-	noted	-
6.4.4	support idea of CG near Grant Rd	94	-	noted	-
6.4.4	Fruit trees should be planted near parks & seating. Also plant ferns	239	-	noted	-
6.4.4 & 9.5.3 & 9.6 ?	horticulture activity not for commercial gain	170	look at definition used for CG. Need to emphasis that TB is not-for-profit	Accept	see 103 above
6.4.4	a lot will take place off TB or be outside. If buildings are available they are being used if wet outside	170	-	noted	-
6.4.4 & 9.5.3	limited amount of suitable areas - don't take out native bush for gardens	170	Any decision about the location for a community garden would follow the guidelines in 9.5.1 which will ensure the development does not compromise Town Belt values	noted	
6.4.4 & 9.5.3 & 9.6 ?	Education way of raising awareness - want it to be an acceptable activity. Use TB as a classroom. Envi education recreation activity. Helps schools * & organisations be more active on TB	162	envi educ. Clarify what is acceptable & what is not re education on TB. Not-for-profit/to cover costs. Ban commercial or formal education providers	partly accept	Any environmental education activity can occur when it supports and complements the primary role and purpose of the Town Belt and fits within the definition of recreation in the management plan.
6.4.4	Possible locations - old bowling greens, where people want them	162		noted	-
6.4.4	Innermost Gardens policy is if people work in garden, able to have produce. Garden is open & people respect that those who tend garden get produce	162	-	noted	-
6.4.4	Core group of 12. Others attend community events & workshops.	162	-	noted	-
6.4.2	Oppose development of more big buildings	162	-	noted	-
6.4.4	CO hold regular working bees, talks. Do not have exclusive access to site (track through it to golf course etc)	180	-	noted	-
6.4.4	CO not a traditional use. Recreation activity, community involvement. Activity excellent example of guiding principles. Site is able to be used by all	180	-	noted	-
6.4.4	If CG&O organisation winds down, then they need to carry out responsibility of lease. Would require formal closure & return to Council	180	Groups would need to follow requirements of licence or lease.	noted	-

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6.4.4 & 9.5.3 & 9.6 ?	CG outdoor pursuit. Good way to involve new immigrant groups. Oppose movement towards individual allotments, sell for profit or holding course with formal qualifications	217	Need to emphasis that TB is not to be used for individual plots and not-for-profit.	accept	see 103 above
6.4.4 & 9.5.3 & 9.6 ?	restrictive activities include CG with keep out sign. Groups have advertised as selling produce	161	Need to emphasis that TB is not to be used for individual plots and not-for-profit and open to public.	Accept	see 103 above
SI	ecological needs primary concern for any future sports facility development. Car-parks & drive-on access should be discouraged.	214	Any application for sporting development has to be assessed against the guidelines in 9.5.1. One of these looks at the effects of the development on the landscape character and values of the Town Belt. development would also be limited to within the existing footprint of Sport and Recreation Parks	noted	
SI	"playing fields should be physically sustainable & have minimal environmental impact as far as possible" & support "ecological connectivity" of rest of TB - like tracks policy 6.6.11	214		noted	-
SI	artificial sports fields create single purpose usage, poor natural ecology, long-term commitment to upgrading & replacing & industrial equipment to install & remove	214	They do support objective 6.5.4 to maximise use of existing facilities	noted	-
SI	support limiting sport facilities to existing sites	214	-	noted	-
SI	impact of providing for specialised sporting activity is actual or perceived allocation of land for exclusive use	215		noted	-
6.4	final sentence - "infrastructure for recreation activity must not be provided to the detriment of open space values"	215	-	noted	-
6.4.1	Elite sport - question if Council unduly pressured by bids for greater WCC support for some of these activities	215	-	noted	-
SI & Ch 9	Need clear set of guidelines required to allow groups to cater to changes - reduction, enhancement, extension of buildings & land under lease. Current guidelines far from clear, interpreted incorrectly	216 & 111	Agreed that there is a need to develop a simple flow chart outlining the key steps in the process.	Accept	develop criteria to assess applications and add into plan as an appendix.

SI & Ch 9	Framework would provide transparent process & clear sets of guidelines about making applications and timeframes (land owner approval & Resource consent). (216 - This would ensure groups on TB do not incur expensive court costs like Badminton)	216 & 111	develop flowchart of process as Appendix. Customise to TB policies	Accept	see above
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SI	Council says it is under-resourced for organised sports. Growing demand for facilities from public. Balance has not been struck	216	-	noted	-
SI	Wellington climate not conducive to outdoor recreation. Indoor recreation facilities required. Should have a long term plan to provide a range of world class facilities, including indoor & all weather surfaces	216	Covered under Community Facilities Policy.	noted	-
SI	Deed has a wide definition about recreation. Council can not narrow interpretation. Envi Court & High Court has provided clear guidance on interpretation of Deed & what activities are permissible. Includes indoor recreation, extending premises outside existing footprint. Council should follow direction of Courts	216	The proposal to limit to existing footprints applies to Sport and Recreation footprints such as Hataitai Park. Not just the lease footprint in this situation.	noted	
r	meet the needs and expectations of sporting codes - clarified by recent Envi Court decision	111		noted	develop criteria to assess applications
SI	world class facilities close to city will attract talent to city	216	-	noted	-
SI	organised sport has considerable area of TB - should not be expanded at expense of informal use. TB is not appropriate for increasing demand from organised professional sport & commercialisation	217	Organised sport is limited to existing Sport and Recreation Park footprints or leased areas for clubs outside of these parks.	noted	
6.6.2	extension - limit to additional 20% of existing footprint &/or leased areas & associated carparks. Population increasing. Clubs need ability to renovate or extend. Percentage could be relative to population growth since building built	244	All applications for extension are assessed on their own merits. The extension of buildings within Sport and Recreation parks such as Hataitai Park is limited to the Park footprint and not the building footprint.	reject	-

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6.6.5	casual use/pay-for-play. Should be discouraged as casual users have no commitment to a club & no interest in volunteering	244	Council encourages all to participate in sport and recreation - & changing lifestyles mean people are less committed to more traditional team structure. However also support sports clubs delivering these.	reject	-
SI	gives Council carteblanche to develop formal sporting facilities & infrastructure. Concern about associated infrastructure eg carparks, cafes.	36	all applications for sporting infrastructure will be assessed against existing Council policies and the specific Town Belt policies such as considering alternative sites (non-Town Belt) first, limiting development to sport & recreation parks, impacts on existing uses and users & landscape ...	noted	-
SI	TB should remain green - not dotted with buildings etc. Any buildings should be on other land that may need to be purchased.	36	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. Future development will be limited to within the existing footprints of sport and Recreation Parks.	partly accept	develop criteria to assess applications
SI	Proposals for TB remove protection for open spaces for informal outdoor activity.	36	The plan supports informal outdoor recreation and identifies areas where further development can occur. It does not remove protection for informal activity.	reject	-
SI	Do not want a balance between open space and sport. Want TB to remain as is	36	-	noted	-
SI & 8.8.4	PNP Cycling club - medium term vision is for surface of velodrome to be replaced/resurfaced/upgraded	45	see Ch 8	-	-
SI	Draft plan for BMX track in Karori - could this be located at Hataitai	45	These issues will need to be considered as part of the master plan development	noted	-
SI	Hataitai area could be become cycling skills area/centre for cycling - new NZQA course. Could use tennis courts (going a round cones)	45		noted	-
SI	If not Hataitai Park, could Newtown Park be used as velodrome?	45	No - high demand for quality grass sportsfields. Recent investment	reject	-
SI	if existing facilities wish to develop/improve - sign well supported within community & therefore should be allowed	46	-	noted	-

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SI	Need to have high hurdles to those clubs wishing to expand buildings. Can't just use "cheaper in TB, easy access, affordability for all" as reasons. Future generations will lose open spaces	4	all applications for sporting infrastructure will be assessed against existing Council policies and the specific Town Belt policies such as considering alternative sites (non-Town Belt) first, limiting development to sport & recreation parks, impacts on existing uses and users & landscape ...	partly accept	develop criteria to assess applications
SI	multi use is good. Happy existing sporting facilities will remain	53	-	noted	-
SI	expensive to maintain, erodes community services. Multi use facilities where possible or use our available space more wisely	55	-	noted	-
SI	should have put velodrome in new sports centre	55	passed on comments	noted	-
SI	facilities for organised sport are becoming increasingly 'unnatural' (indoor, artificial, large club rooms). Should be located elsewhere	76	all applications for sporting infrastructure will be assessed against existing Council policies and the specific Town Belt policies such as considering alternative sites (non-Town Belt) first, limiting development to sport & recreation parks, impacts on existing uses and users & landscape ... Artificial enable more activity - mean less demand for more flat land for sportsfields. In some cases, this could free up sports fields for other purposes	noted	-
SI	sporting hubs' mentioned - need greater detail	76	define sporting hubs	Accept	define sporting hubs
6.6.4	Concern about tend towards professional sport being governed by trans-national franchise investors - de facto private property right. add "... It is intended that professional sporting teams, will on the expiry of their present lease, be required to relocate to land outside the TB. In the meantime the TB land and buildings enjoyed by professional sporting teams are to be available at most times for community use and access. "	77	Need to be an incorporated society or trust to be granted a lease (Leases Policy for Community and Recreation Groups). For instance Wellington Rugby Football Union leases the Rugby League Park pavilion and uses Rugby League Park for a range of rugby activities from junior and academy levels through to elite sport and the Hurricanes.	partly accept	amend policy 6.6.4 as follows: " <i>Support the use of the town Belt by elite sport provided such activity complements and enhances community use, access and participation".</i>
9.5.1j & 6.5.4	assessing alternative sites & multiple use of existing formal indoor & outdoor recreation foremost principles. Go a long way towards protecting open natural space for informal recreation	77	develop flowchart of process as Appendix. Customise to TB policies	Accept	see 216 & 111 above

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6.6.5	reverse orientation towards exclusive use. restate - "... clubs must allow casual play and their facilities and their membership shall be open to all members of the public ..."	77	Casual play is not practicable for all sports where there is structured play and tuition but barriers to participation should be reduced as much as possible. Often club membership, helps to support and develop club health and provides resources required to run the sport.	reject	
SI	avoid centralising facilities - those in more distant neighbourhoods have to travel further. Their neighbourhood remain deficient of recreation facilities	77	policy around multi-use will encourage more use of facilities. Intention is not to decrease accessibility of sport and recreation facilities on Town Belt	noted	-
SI	primary purpose should remain recreation & organised sport is an essential part of this. Needs of sport & clubs should be top priority. Disagree that natural environment is more important. TB is not a nature reserve	78	needs of sports/clubs top priority	noted	-
SI	Facilities should be retained & added to if needed	78	-	noted	-
SI	sporting facilities should be in non-natural envi on TB	80	policy in draft 6.6.2	noted	
SI	natural areas supersede sport (high input monoculture with exclusive use). Prefer seeing forests	83	-	noted	-
SI	do not want further or larger buildings on TB. Limit to existing footprint - not parks footprint Commend caution about elite/professional sport & sportsville.	84	some development of buildings on Town Belt (eg extension) is likely to be needed. These policies requires some flexibiity for growth but within a framework that requires an assessment of the activity including options for siting the activity off site.	reject	-
SI	Leave as much as possible as open space - protect biodiversity & heritage values & passive or informal recreation	84	-	noted	-
SI	support defined limit on buildings or usages which remove land from open public uses	90	-	noted	-
SI	outdoor sports clubs are major contributors to 1) health & well being & 2) public recreation of members. Sports clubs are not exclusive organisations - exist to facilitate sport & social/community activity for members	91	noted	noted	
SI	reality is land is limited in city.	91	could add information into section 6.4.1 to note the limited amount of flat land is the reason why existing spaces need to cater for more intensive use.	Accept	add in short section to 6.4.1 - The Town Belt provides large areas of accessible land close to the city. The city has limited land suitable for developing into sportsfields.

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SI	Must enable clubs to commercially exploit opportunities to make up financial short fall not covered by player subscriptions	91	This needs to be limited by activities that support the clubs activities and are related to supporting public recreational use of the Town Belt (9.6.3)	noted	
SI	selective use of TB for recreational purposes enhances its relevancy & accessibility. Structures should be semi-permanent - they can be removed & land returned to its natural state	93	Semi permanent structures may be applicable in some circumstances but for long term use by sports clubs with leases more permanent structure and buildings are required. Policies limit their development and also require removal if no longer required.	reject	-
SI	primary purpose for recreation. Addition of clubrooms strengthens a club & draws more people to activity. Not advocating clubrooms everywhere - but on fringes, near roadways near sportsfields. Encouraging & increasing active recreation by city inhabitants original reason for TB	99		noted	
SI	sports facilities important as well as other recreation facilities	21	-	noted	-
SI	agree - limit more encroachments by sports clubs	22	-	noted	-
SI	allow rationalisation of underutilised facilities & develop multi-use facilities - more modern, lower maintenance	61	-	noted	-
SI	balance needed. Will allow rationalisation & development of better facilities for existing sports	62	-	noted	-
SI	avoid excessive use of facilities. Ensure high standard of ground surfaces, avoid conflict of users	63	-	noted	-
SI	limiting facilities = limiting all sports people - why would Council not allow for growth & development	224	limiting development - on Town Belt. There are other parks or private land where development could occur. There will be a site-by-site assessment of any application to expand facilities. Will need to meet a number of criteria. A survey of Wellington residents in 2009 supported restricting new developments to existing sports hubs and opposed new developments occurring throughout the Town Belt. The draft policies in the management plan reflect this.	noted	-

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SI	make sure demands of organised sport don't lead to over-intensive development	225	all applications for sporting infrastructure will be assessed against existing Council policies and the specific Town Belt policies such as considering alternative sites (non-Town Belt) first, limiting development to sport & recreation parks.	Accept	see 216 & 111 above
SI	intensive sport activity can be accommodated elsewhere. Convert non -TB sportsfields to all weather use. Access often restricted so don't support these activities on TB.	231	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. Sportsfields on Town Belt are an integral part of the city wide network. Artificially enable more intensive activity rather than having to use as much grass fields (approx 1ha per sportsfield) Little flat land available in city to develop more grass sports fields	reject	-
SI	retaining/extend natural area, avoid encroachment by sports	234	plan identifies natural areas and areas where more development could occur	noted	-
SI	Co-use of buildings & limiting extent of buildings - essential. Retain area of built construction the same as today	231	some development of buildings on Town Belt (eg extension) is likely to be needed	reject	
SI	sports facilities should not encroach	235	plan identifies natural areas and areas where more development could occur	noted	-
SI	enough sports facilities	239	-	noted	-
SI	Development should be on existing land. encourage sharing especially where sports not making full use of existing facilities.	243	some development of buildings on Town Belt (eg extension) is likely to be needed	noted	-
SI	Oppose development of commercial recreation activities, cafes, elite sport	243	Commercial activities are prohibited unless they facilitate public recreation use (9.6.3)	noted	
SI	Many sportsfields are in bad condition. Need upgrade and improve drainage	246		noted	-
SI	build dedicate sports areas with changing rooms with hot water. Have dedicated informal recreation areas with no sport	246	draft plan policy 6.6.2 covers where development could occur.	noted	-
SI	Have reservations about where going with elite sport. Elite sport may have opportunities to co-locate at Basin Reserve	96	Elite sport must complement community access and use. Could strengthen policies	accept	amend policy 6.6.4 as follows:"Support the use of the Town Belt by elite sport provided such activity complements and enhances community use, access and participation".
6.6.3	recreation could be anywhere. Hurricanes could train anywhere	240	Wellington Rugby Football Union leases the Rugby League Park pavilion and uses Rugby League Park for a range of rugby activities from junior and academy levels through to elite sport and the Hurricanes.	noted	-

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SI	sport takes away from open land. Not consistent with connection to nature. No expansion of formal sport	194	-	noted	
SI & ch9	difficult to predict development needed in future eg popularity of sevens, Impact how people want to participate in sport. Want ability to change & meet demand. Request change to wording around expanding existing footprint	75	The existing footprint includes not only the leased area, but in the case of Rugby League Park the footprint of the overall park. Can improve policy 6.6.2 to ensure this is clear.	accept	Improve the wording of policy 6.6.2 to clarify what this means.
SI & ch9	Some facilities will be on TB. Want ability to change. If demonstrated need we don't want unnecessary onerous. Do not want policy to be Council won't consider any proposal to build on TB	75	We will develop a clear criteria for the steps to follow when making an application There is flexibility for those activities within Sport and Recreation Parks and in existing leased areas.	accept	see 216 & 111 above
SI	where vacant/dilapidated buildings - opportunity to remove if no other use that fits guidelines	186	-	noted	-
SI	development should be judged against basic criteria - retention of open space, allowing access at all time, support grouping clubs joining/sharing - multi-use purposes	231	add process as appendix	Accept	see 216 & 111 above
6.6.3	support initiatives going to local schools eg sportsfields. Will relief some pressures on TB	231	alternative sites - first assessment carried out. Applicants will have to provide reasons for why this is the best location for the activity	noted	-
SI	velodrome currently has concrete with steel reinforcing starting to come through. Tired state - still useable. Regional facility that is used by a number of sports.	45	-	noted	-
8.8.4	would like recognition of cycling club at HP	45	add PNP cycling to 8.8.4 & CH 6 table	Accept	add PNP cycling to 8.8.4 & CH 6 table
SI	plan should allow indoor facilities. Policies should not stop them	216	emphasis is on outdoor recreation. Policy is not stopping applications for indoor to be assessed	reject	
SI	limit on sports facilities - as long as doesn't stop development of MTB trails	252	good point - ensure MTB trails - not listed as sporting facilities in policy 6.6.2	Accept	add footnote to policy 6.6.2 to confirm Sporting Facilities does not include tracks and associated structures such as signage etc.
6.6.3 & 6.4.2	organised sport can be accommodated outside greenbelt. But its accessibility makes it attractive. Sportsfields can also be	29	alternative sites - first assessment carried out. Applicants will have to provide reasons for why this is the best location for the activity. Add	Accept	develop criteria to assess applications. Add comment about sportsfields used for informal recreation, events etc
SI	would like fewer built/fenced off areas. Would like to see most of TB land restored to natural areas	2	The Town Belt provides areas for formal sport and has for over 100 years. That will not change. The proposed plan limits further development to within the existing footprint of sport and recreation parks or leased areas.	reject	-

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SI	consolidated use of areas or further development is an important consideration	35	-	noted	-
SI	hockey expensive sport (specialist surface) - need to generate non-hockey revenue	196	Proposed changes in policy to add some of the wording in the Leases Policy about commercial activity.	accept	"Add policy 8.8 from leases policy + into the guidelines in 9.6.3 <i>"the commercial activity complements and is ancillary to the group's primary community or recreational activity"</i>
SI	Want to build hub around facilities to generate more of a hockey community	196		noted	-
SI	Huge pressure at Stadium even in summer. Forces Wellington residents to use facilities outside city	196	-	noted	-
SI	not against presence of Badminton on TB, but against more building/extension. These activities don't have to go on tB	209	Any application for the development of facilities on Town Belt will need to go through the assessment process that will be outlined in the final plan.	noted	-
6.6.3	flat parts close to city - important to retain. Free access. Artificial turfs enable more people to play but more fences go up around sportsfields. Look at other parts of city.	217	When applying for a new development applicants will have to provide reasons why this is the best location for the activity.	noted	-
SI	Many people would not know playing on land has historic significance	217	-	noted	-
6.6.3 & 6.6.4	professional sport have own venues eg stadium - shouldn't be on TB.	242	When applying for a new development applicants will have to provide reasons why this is the best location for the activity and/or development.	noted	-
SI	Other parts of city could be used - eg Makara Peak & OGB is an alternative site for events/outdoor adventure activities	161 & 242	Other sites could be used but there are times when the Town Belt is more suited to such activities.	noted	-
SI	concern about allowing permanent uses - or at greater levels than envisaged. Difficult to take buildings off	161	leases policy - has process to assess viability of clubs. The plan has policies around removing buildings	noted	-
SI	TB seen as cheap source of land	161	-	noted	-
SI	by sharing club facilities, could reduce area leased	77	-	noted	-
r	TB used by people of all ages, variety of recreational uses	103	-	noted	-
r	keep research in mind - residents favour informal recreation & access to TB	109	definition recreation - emphasise informal rec	noted	
r	no additional land be developed for organised recreational facilities (formal recreation) in the TB - add policy from existing TBMP	134 & 110 & 191 & 209 & 88 & 142 & 197	The new management plan has refined this policy by outlining the need for flexibility within existing sport and recreation parks. It does outline where development cannot occur	reject	

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r	"recreation" defined in such a way that informal recreation is emphasized - main way TB is used now & always has been - to protect TB open space	110	The current definition identified in the management plan in section 6.2 does emphasise the ...retention of open spaces..	noted	
r	want to see greater emphasis on informal recreation - often overlooked	112	The current definition identified in the management plan in section 6.2 does emphasise the ...retention of open spaces..	noted	
r	free public access is essential. Leasing land for exclusive use should be kept to a minimum	112		noted	-
r	encourage use of areas that are minimally used - add paths, create focus with plantings); improve signage throughout	116	-	noted	-
r	support shared access & encourage further communication between groups to reduce incidents of user conflict	117	-	noted	-
r	preserving natural areas & enhancing ecosystems takes priority	118	The plan outlines areas to be maintained as part and recreation parks and areas to be kept for informal recreation and as natural areas	noted	
r	encouraging citizens to use green belt for recreation will make more people appreciate TB. Healthier	122	-	noted	-
r	should be available to everyone irrespective of sport or informal recreation	123	principle/objective	noted	
r	support attempt to balance informal/organised recreation	126	-	noted	-
6.2	should not rely on 1839 instructions. Reliance should be on Reserves Act 1977 - permits provision of facilities for sport and excludes childcare, preschool etc	126		noted	
6.4	1840 plan - no relevance. Trust Deed only relevant within provision of Reserves Act	126	1840 plan outlines original intent of NZ company. The Plan acknowledges the significance of this date and the return of former Town Belt lands held by the Crown.	noted	-
r	enjoy outdoors healthy activity so allowing informal recreation will encourage people	131	-	noted	-
r	support balance. Where organised sporting activities occurring in natural areas (orienteering, trail running, MTB) - do not want any change/limit on access	132	informal recreation and sports events on tracks network is supported in the plan.	noted	-
r	play - encourage more recreational use	133		noted	
r	innovative developments eg adult playground or outdoor gym circuit - motivates people to get out & enjoy TB	133	These innovations could be considered throughout the city within communities. There may be some areas where this could best occur on Town Belt.	noted	-

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r	create space with permanent structures which can make spaces for people to come to regularly (eg adult playgrounds or gym circuits)	133	could look at city-wide	noted	-
r	modify existing space with temporary structures - seasonal, temporary - that encourage activity (eg CG pop-up in Civic Square) or sheltered areas	133	There may be areas within the Town Belt that would suit temporary structures and events. These will be considered on a case by case basis using the assessment in 9.5.1.	noted	-
r	modify space with programmed activities which encourages the use of unused TB areas by local communities eg plant a tree a day)	133	more programmes - 6.6.23	noted	-
r	improve access - young people have limited means of income & private transport. Walkways connect different sections of TB should be developed	133	There are already key linkages on many parts of the Town Belt. The proposed Mt Victoria Master plan will address key linkages in this sector.	noted	-
r	recreation' means many different things to young people. Physical activity, social gatherings eg CG, technological orientated eg video gaming. Consider incorporating technology - map hot spots. People can track where they are, how far they have walked	133	Smart apps and electronic information is being developed for the overall reserves network not just the Town Belt. Recognise the usefulness of using this technology.	noted	-
r	support TB used for a wide range of activities. Cautious principles can be narrowly interpreted to exclude many desirable activities	135	Principles summarise common values so are quite broad. The specific objectives within each section give more direction around suitable activities.	noted	-
r	informal/formal - kept in balance as demands change over time	136		noted	-
r	having sporty fit people in city - what need	137	-	noted	-
r	do not support development/expansion of formal sport and recreation facilities eg recreation hubs. Need for buildings, fences, carparks - contrary to Deed, privatises parts. Not informal outdoor recreation or support ecology & landscape objectives.	142	Buildings are not excluded or contrary to the Deed. Development can only occur within the footprint of sport and recreation parks and/or leased areas. Any application will be assessed against a range of criteria.	noted	-
r	definition etc -emphasis on informal public recreation	142 & 191	The current definition identified in the management plan in section 6.2 does emphasise the ...retention of open spaces..	noted	-
6	Areas leased should not increase beyond existing 5.9ha	142	Area leased – this maximum area stipulated in the drafting instructions is the status quo (from 1908 Act).	noted	-

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r	clubs and groups that want to expand or establish new facilities are urged to seek alternative locations not on TB	142	Alternative locations (non-Town Belt) for the proposed activities will be the first thing considered for all applications received for sport & recreation developments on Town Belt. Recognising that Wellington has limited flat land available for sporting facilities	partly accept	develop criteria to assess applications
r	Want commercial ventures on TB to be banned	142	Commercial activities are managed activities that are allowed if they complement and are ancillary to the groups primary or community activity. In addition they should be necessary for the public enjoyment and use of the reserve.	reject	
r	all parts of TB should be accessible for sport & recreation	145	all applications for sporting infrastructure will be assessed against existing Council policies and the specific Town Belt policies such as considering alternative sites (non-Town Belt) first, limiting development to sport & recreation parks, impacts on a site-by-site assessment of any application to expand facilities. A survey of Wellington residents in 2009 supported restricting new developments to existing sports hubs and opposed new developments occurring throughout the Town Belt.	reject	-
r	room for expansion of facilities so long as not stopping others from enjoying space. Badminton Hall fought for years to increase parking. Grass space nearby not used by anyone	148	site-by-site assessment of any application to expand facilities. Will need to meet a number of criteria that are stronger than other areas of the city. A survey of Wellington residents in 2009 supported restricting new developments to existing sports hubs and opposed new developments occurring throughout the Town Belt. The draft policies in the management plan reflect this.	noted	-
r	continue to allow dog access & permit dogs off lead in larger areas	15	will be considered when review Dog Policy in 2014	noted	-
r	sports played at parks - table does not record fencing at Tanera Park	161	amend table to include all sports/recreation clubs on TB etc	Accept	amend table on page 46 to include fencing at Tanera park
r	support greater provision for commuter walkers & cyclists. Want accessible design to have disabled access. Identify key iconic views. Support council providing a range of walking tracks - wheelchair to higher fitness & skill levels	177	Commuter links are already identified as well as major lookout points especially on Mt Victoria and Te Ahumairangi Hill.	Noted	-

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r	widen 'recreation' criteria to include indirect enjoyment eg stroll along TB, walk to work.	182	The current definition on page 42 is fairly broad and would encompass the indirect enjoyment associated with walking to work,	noted	
r	easy to lose informal & casual use by over-development of sporting facilities. Informal offers restorative & cultural value	194		noted	
6.5	aim should be to maximise opportunities for community recreation participation of all types, at all levels. Instead of informal recreation vs organised sport	204	The introduction to the chapter identifies the various informal and health benefits of recreation and use of open spaces.	noted	
r	policies & assessment need to allow for changing participation patterns. More informal use, & less formal use (eg if artificial surfaces continue)	204	plan is due to be reviewed in 10 years. Changes in participation are also reviewed when leases come up for renewal (most are 10 years in length)	noted	-
r	active recreation emphasis. Formal participation in team sport is dying. Spontaneous recreation is new soccer	206	Participation though team sport particularly at the junior level is rising in some sports and the city is increasing sportsfield capacity to manage this. Other sports are reducing in popularity.	noted	
6.1 & 6.5	these sections ignore protection of TB open space. 2009 survey - majority oppose new development	209 & 88	Section 6.4 on page 45 outlines the results of the 2009 survey. Policies 6.6.2 and 6.6.3 support this by limiting development to existing Sport and Recreation Parks and requiring an assessment of any application.	noted	
6.5.3	include "open space value"	209 & 88	The term open space has a very broad definition that includes areas set aside for recreation and sport. The current terms landscape and ecology include the broad "open space" values.	reject	-
6.5.6	"all forms" of recreation should not be encouraged if compromise TB open space	209 & 88	The wording does imply that anything goes. Suggest slight change	accept	change objective 6.5.6 to <i>Participation in all forms of sport and recreation is encouraged and supported.</i>
6.6.1	concern "diverse range" of sporting & recreation "opportunities" that satisfies "the needs" of citizens "and visitors".	209 & 88	Currently, the Town Belt is used for many different recreation and sporting activities. Policies around sporting infrastructure are much stronger in the TBMP compared to other reserve management plans in the city. The Town Belt is a popular destination for residents to take their visiting friends and family to show off a place they value. However this policy needs to be read in conjunction with the others that limit development (6.6.2 and 6.6.3)	noted	-

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6.5	recast/render/tighten objectives	215	Suggest some change to policy 6.6.4 to focus on amalgamation of clubs. Suggest a slight change to the Policy 6.6.3 to emphasise the process that will be followed	accept	change 6.6.4 to read " Clubs will be encouraged to share facilities and play with other clubs subject to..... Change bullet point 5 of policy 6.6.3 to " <i>being consistent with the leasing process outlined in the Leases Policy for Community and Recreation Groups</i> .
6.6.2	concern - explanation about footprints needs tightening	215	footprint definition	Accept	define footprint
6.6.3	adjust to make clear Leases policy is subservient to TBMP	215	changed policy 6.6.3 as shown above to focus on the process in the leases Policy. Note the leases policy does outline the relationship between management plans and the leases policy. Section 5 " <i>management plans and Council strategies will be used by officers to ascertain what activity or structure can be permitted on an area of land</i> "	reject	-
6.6.4	should not specifically mention 'sportsville' type model.	215	define sportsville in 6.4 (bullet point 3 on pg 47) - but don't include in policy 6.6.4	accept	Note changed policy above.
6.6.5	support - edit end "this management plan".	215	The additional words do help to clarify the meaning of the allowable activity and focus on two issues that need to be considered.	reject	-
6.6.2	focus should be one providing best facilities for residents - need to be flexible	216	There is still plenty of flexibility within the existing footprints but it also acknowledges that the Town Belt has specific qualities that need to be protected and enhanced.	noted	
6.6.3	reality is land suitable for developing close to town likely to be TB	216		noted	-
6.6.4	reference appears twice	216	two 6.6.4 - re- label	accept	two 6.6.4 - re- label and renumber the rest
6.6.4	disagree with preference to 'sportsville' model	216	define sportsville in 6.4 (bullet point 3 on pg 47) - but don't include in policy 6.6.4	accept	change 6.4 & 6.6.4 and add in Sportville definition from Leases Policy
6.1	mention benefits to mental health & importance of play in an unstructured way in natural envi	217	Already mentioned in 6.1	reject	
6.2	definition in 1995 Plan & Reserves Act very appropriate re retention of open spaces & emphasis on outdoor recreational activities	217	The definition on page 42 does emphasise the retention of open spaces	reject	
6.6.4	clubs encouraged to share facilities	217		noted	-
6.4.1	Proportion of parks on TB. Is enough thought given to future expansion being in outer suburbs	217	A city wide programme of sportfield upgrades and artificial turf development has occurred over the past 5 years. Many of these developments and upgrades have occurred off Town Belt.	noted	

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6.6.2	does footprint mean the whole park? Would enable major building projects	217	Yes it does mean the whole park but this is then assessed against the park character and the guidelines for development.	noted	
6.6.18	CG - non-profit non-commercial	217	see 6.4.4 above	Accept	add "not-for-profit"
r	pleased reference to open space/not to be built on aim if 1839 & emphasis on informal outdoor recreation.	217		noted	
r	agree need to limit formal facilities & encourage co-sharing	217	-	noted	-
6.6.3	assessment - too restrictive to existing leases. Other locations not financially viable for sports clubs	244	The assessment will be simplified using a diagram to show the process involved.	accept	see 216 & 111 above
r	commitment needs to be Universal Accessibility to improve accessibility for all within TB principles. Council committed to continue improving access & accessibility of features where reasonably practically to do so.	251	accessibility - change guiding principle	accept	Officers recommend that the wording accompanying Principle 6, "The Town Belt is for all to enjoy" be amended to better articulate universal accessibility.
r	Want to see Universal Accessibility included in statutory principles	251	see comments above	noted	
r	support more land for recreation	29	-	noted	-
r	natural areas & wildlife should be kept for nature; don't turn into sporting theme park	30		noted	
r	allow people free space to move around & enjoy being outdoors	37	-	noted	-
r	WCLHC historically share access to city's Town Belt with other recreational users. Respect and appreciated this access Horses in city - distinct attraction about Wellington	39	-	noted	-
r	Unleashed dogs can be a problem in the main track users generally respectful of right of way	39	-	noted	-
r	We request tracks have access for horse thoroughfare, even if restricted - for club members or organised club events	39	check area used by club - is it TB.	noted	amend policy 9.6.8 (l) to identify specific routes
r	more MTB trails excellent tourist attraction	50	-	noted	-
r	perception is recreational needs are well served by Council	51	-	noted	-
r	unorganised sport always less served, lack of visibility	51		noted	-
r	more areas for sports would be better	56	-	noted	-
r	get wellingtonians out there & fit. Orienteering	67	-	noted	-

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r	vehicle access to hill tops - not every citizen young fit & able. Can share the city's beauty at viewpoints	6	vehicle access - no plans to build more roads. Focus on improving accessibility to lookouts including at southern end of Te Ahumairangi Hill	noted	-
r	TB should be able to provide for both informal and organised sport. Organised sport on flat land & plenty of hillside for informal recreation	73	-	noted	-
6.6.21	"Provide first & foremost passive &/or informal recreation spaces	77		accept	re-order policies in section 6 - have general at start, then informal, then sport
r	seems to achieve balance. Lucky to have TB - gives Wellington a character different from other cities	80	-	noted	-
6.6.5	support policy - protects public recreation & participation	95	-	noted	-
6.6.5	disturbed to read clubs want to limit use by casual users to protect turf of specialist surfaces. New fence prevents public crossing TB	95	The fence at Wakefield Park does limit access when activities are occurring on the turf. However it does not prevent access at other times when the area is available for informal activities.	reject	
6.6.2	Support limiting development	95	-	noted	-
6.1-6.4 & 6.6	reverse order of sections & have informal activities first - more closely aligned with original tB concept- vs elite sport	95	consider order	Accept	reorder headings in ch 6 - have informal activities first - main use
6.6.1	delete policy - creates expectation all recreation & sporting activities valued by citizens will be allowed on TB eg rifle ranges, quad bikes. Council does not have to cater for all needs on TB - can be met on other Council land or on private land. Council does not need to adopt policies of previous Councils who failed to acknowledge TB land gifted to people - for use as open public space with no buildings	95	The definition of recreation does emphasise informal rec. Alternative sites - assessment will look at this first. Applicant will have to provide reasons for why activity needs to occur on TB. This policy recognises that there should be a range of activities but these will be limited by their policies relating to protection and enhancement of the Town belt character.	reject	
ch 6	alert readers to restrictions on activities allowed in Ch 9	95	Could add short section at end of 6.4 last bullet point	accept	Add onto last bullet point ... <i>the Rules section (9.5.1) outlines the key points when assessing applications for land owner approval for developments including new sporting infrastructure</i>
6	add generic interpretation policy	95	See 131 below	noted	
r	encourage sport for social & health benefits	211	-	noted	-
r	sport can change - look at increase in cycling	236		noted	
r	leased land - no more than existing area (5.9ha). All leases, licences should be publically notified. Private commercial ventures be banned	237	Area leased – this maximum area stipulated in the drafting instructions is the status quo (from 1908 Act).	noted	-

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r	objectives good - caution organised sport able to over ride rules	249		noted	
r	more use of TB - good track network	49	-	noted	-
r	sparse reasons given as to why people are not using TAH	43	There is no specific research as to why this is the least visited.	noted	
r	what would help families/disabled to access tB. Some underutilised areas could get more use. Will help people acknowledge & preserve TB. Make it part of lived experience of wellington	43	Some of these are citywide issues that will be addressed during the development of an open space and recreation framework.	noted	-
r	no objective to encourage Maori/new immigrant/elderly	43	Objective 6.5.7 notes the general health and benefits of using the Town Belt. The Open Space and Recreation Framework will focus on activity and participation within key groups.	noted	
r	financial aspect - where reasonably practical to make access for all	251		noted	
r	uses - consider 1839 map - enshrined in deed	161		noted	
r	retain land for passive recreation	200	-	noted	-
r	land retained for passive recreation			noted	
6.6.1	Tourists may need cafes, restaurants, gondolas, 4WD. Statement contradicts early one about the Deed being most important document. Tourists welcome to use - same way locals do. Amend policy	209	The term community in 6.6.1 is intended to cover both residents and visitors. Tourists may need activities and facilities but which of those will go on Town Belt will be limited by the Management Plan and the Deed. Any activity should be necessary to enable public use and enjoyment of the Town Belt.	noted	
?	governing rules - should include the following 1) equal balance of nature & organised sport; 2) promote sport; 3) international facilities; 4) indoor/outdoor facilities; 5) extend footprint; 6) promote group and sponsors	216	Ther guiding principles have already been developed and outline the community values of the Town Belt. The devleopment of sporting infrastructure needs to be balanced with the need to protect and enhance the informal nature of the Town Belt and its unique landscape and ecological character.	noted	-
9 & 6.4.1	WRFU after longer lease - facility a liability for banks. Commercial activity should be allowed anywhere	241	see response ch9	-	-
7.5.9	definition of heritage - sufficiently wide enough - or include general interp policies in Ch 6	95	ch6 add to	noted	see 133 below

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7.1	history should be chronicled across TB through plaques/info booths	133	Add something about interpretation to Ch 6 passed on suggestion to ... tie to ch 6? Opportunities to appreciate...	accept	New policy 6.6.25: Interpretation of the features and values of the Town Belt will include the history & culture, ecology and recreation.
	look at portals for access & have sign boards with history at multiple points. Where are tourists going? Cable car, Mt Vic etc - walk through TB to get back to CBD etc	203	Need to improve signage and interpretation on site. Will include this in the development of the proposed Mt Victoira masterplan	noted	see 133 above
	Nothing about interpretation or possible use of species for Mana whenua purposes. Guardianship - these could be covered. Aim to source native species from TB in future. Build up trust, use and involvement in TB by mana whenua	203	Add something about interpretation to Ch 6. Cultural harvesting is listed as a managed activity. Need to be consistent with policies in the Otari plan Does it fit in community gardening?	accept	see 133 above. NEW 6.6.26: Cultural harvesting of plant material for non - commercial cultural purposes by maori will be considered at designated sites.
	Maori connection at Mt Victoria is obvious - signs. Need to look at early occupation, research early use, map early walking tracks	43	Add something about interpretation to Ch 6. passed on suggestion to ...	noted	see 133 above
6.5.7 & 6.6.21 ?	TB as a cultural artefact is important. Recognised in plan. Is there a role for Wellington Sculpture Trust?	177	The objectives already cover the wide range of options for sport and recreation. These will cover public art. Recommend add an additional objective to cover the process for art installation.	Accept	NEW 6.6.24: Donated or commissioned artworks shall be sought for predetermined sites, according to specified requirements. Any assessment of proposed public art will be carried out via Councils Public Art Policy (2012).

CHAPTER SEVEN - Culture and History

Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
	recognition of Town Belt - seek Historic Places register listing or World Heritage Status	77, 237, 114, 217, 241	Support going for national recognition (eg Historic Places register). Going for World Heritage Status is a long process and any group advocating for this status would need to show that the Wellington Town Belt is the best example in the world. Currently the Town Belt does not have recognition at national level eg Historic Places register	partly accept	Proposed new policy 7.2.1 7.2.1 Explore listing of Town Belt on New Zealand Historic Places Register to recognise historic importance.
	protection of Town Belt - heritage sites are not listed in the District Plan	72, 32	Review of DP is planned in next few years. This will provide the opportunity to identify & protect important heritage features, such as heritage trees. We will pass on comments to Heritage And District Plan team	noted	-
	Interpretation needed	133, 203, 43, 95	add policy to chapter 6	partly accept	add new policy to Chapter 6 Recreation

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1.2 & Ch7 & Appendix 3 & 4	focus on future not Maori revisionist history. Creates unease and contention not relevant to plan	250	SEE RESPONSE IN CHAPTER 1	-	-
1.2 & Ch7 & Appendix 3 & 4	history should be factually correct and uncontroversial	250	SEE RESPONSE IN CHAPTER 1	-	-
7	seeks that the Town Belt's important heritage values and sites are recognised, protected and promoted throughout Plan	72	-	noted	-
7.4 and 7.5	promote enhancement and appreciate through research and interpretation. Historical importance of Wellington Zoo should be included as part of this research	72	The Council will work with the Zoo Trust to carry out this research as part of the work required to register the Town Belt as an historic place.	noted	-
7.3	4 recorded archaeological sites in TB. Gun battery Mt Victoria anti-aircraft battery; Gun battery anti aircraft battery site; Building foundations - WWII observation posts; Building built to replace Clayton Building. Post 1900 so not protected by Historic Places Act 1993. Ways of recognising/protecting these sites should be included in plan.	72	Add these sites to the list identified in section 7.3	accept	
7.5.8	potential for unrecorded archaeological sites - recommend systematic archaeological study be undertaken as part of research	72	thank you for suggestion	accept	add to 7.5.8
7.5.4	“Where possible, proposed works will in the first instance avoid recorded archaeological sites. Where avoidance of recorded sites is not possible, Authority shall be sought from the New Zealand Historic Places Trust before any work is carried out or in areas of high archaeological potential, when there is reasonable cause to suspect that an archaeological site (recorded or for the discovery of unrecorded sites) which may be damaged, modified or destroyed by any activity, an archaeological authority shall be applied for from the New Zealand Historic Places Trust in accordance with the Historic Places Act (1993).	72	ok	accept	Add in a new policy to reflect this.

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9.3 & 9.5	District Plan: include design provisions to protect visual intrusion of buildings	72	Review of DP is planned in next few years. This will provide the opportunity to look at the rules about the design of building. We will pass on comments to District Plan team	noted	-
7	Inventory of heritage trees within TB needed and appropriate protection given to identified trees	72	Review of DP is planned in next few years. This will provide the opportunity to identify & protect important heritage features, such as heritage trees. We will pass on comments to Heritage And District Plan team	noted	-
7 & 8.3	Careful consideration given to rationalisation around Aro Valley - its effects on heritage values and character of valley	72	The proposal is to add land to Town Belt in Aro Valley. Now have a changed priority for the land around Te Aro school which is original town belt now owned by the Crown.	noted	-
7 & 8.7.3	Curtilage of Chest Hospital carefully defined and protected (SEE MAP IN SUBMISSION)	72	Officers will review this with reference to previous conservation plans already in place	noted	-
1.5	how does Management Plan stand under RMA (see drafting instructions		As it stands, the Management Plan is to be considered as a 'relevant matter' as part of the RMA process. However, it will carry less weight than some other instruments, such as the District Plan itself. Under the proposed local Act this will continue to be the case. The Management Plan will need to be considered when assessing matters under the RMA	noted	-
8.6 or 7	consider heritage structures at zoo	72	The Council will work with the Zoo Trust to carry out this research as part of the work required to register the Town Belt as an historic place.	-	-
7	Guiding principle Management ... historic and cultural links ...	77	weren't intending to consult again	reject	-
7.3	suggest memorial sign off Alexander Road dedicated to servicemen should be included	88		noted	
7.3	Old Kilbirnie Road crosses Western slope of Mt Victoria should be recognised	88		noted	
7	sources of historical research need accurate recording - no evidence of such	249	may have only read summary document. Refer to Appendix 3 & 4 have detailed bibliographies. In Ch 7 refer people to Appendices	partly accept	At start of chapter - refer people to Ap 3 & 4
7 & 2.2.4	want recognition of effort of William Tonks to protect TB	249	note Tonks efforts in Appendix. Put general comment about public efforts to protect in 2.2.4	accept	add sentence to appendix 4
6.5.7 & 6.6.21 ?	TB as a cultural artefact is important. Recognised in plan. Is there a role for Wellington Sculpture Trust?	177	obj 6.5.7 - add art/culture space. broaden 6.6. art on TB. Historic fountains. Check botanic garden plan policies pg 28. Check public art policy and Ch 9 activities	noted	see Ch 6

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7.5.5 & 7.5.8	Need to recognise citizens that are not Maori or British descent & their contribution to TB	177	agree - there are other significant figures in history that are not European	accept	change 7.7.5
	Nothing about interpretation or possible use of species for Mana whenua purposes. Guardianship - these could be covered. Aim to source native species from TB in future. Build up trust, use and involvement in TB by mana whenua	203		noted	-
7.4.1	"Significant historical, social and cultural...	215	relates to principle	reject	-
7.3 and 8.8.4	Hataitai Park required excavation works over 50 years ago. Because land reclaimed/artificial - expect greater level of flexibility in land	216	SEE RESPONSE IN 8.8.4	noted	-
7 & 2 and sectors	any plans to include other areas as TB - may diminish "heritage status" and "historic integrity"	230	SEE RESPONSE IN ch 2	noted	-
7.3 and 8.8.4	Hataitai Park required excavation works over 50 years ago. Because land reclaimed/artificial - expect greater level of flexibility in land	244	SEE RESPONSE IN 8.8.4	noted	-
7	Guiding principle - recog historical and cultural links with the land - balance and in general context of	250	-	noted	-
7.1, 7.2, Ap3, Ap4	Need more research and writing. Best achieved as separate documents	250	many of the policies reflect the purpose of TB ... Tinakore.... Possible? But approved by geographic board as part of settlement. Council has no intention of seeking new name	reject	-
	Include separate contributions of hapus, iwis and other settlers	250		noted	
7.2	Stellin Memorial gifted " upon trust " in 1964 (crossed out on Deed)	250		noted	
7	Error with Waitangi Tribunal Report - TB was not wrongly taken from Maori	250	Council will not be seeking a review of the Treaty of Waitangi ruling (Te Whanganui a tara me ona Takiwa: Report on the Wellington District 2003)	noted	-
7.1? & 8.1.6 & Ap3 & etc	McLeverty land - many references to the land transactions. Interpretation of facts continues to be revised	32	See Ch8	-	-
	Maori history/partnership: if not maori can't know about it	165	Man whanua definition based on that in the RMA	noted	
	TB historic connection as food bowl for mana whenua - cultivation, gather berries, birds	43	-	noted	-
7.3	Stellin land should not be part of TB Deed. Should manage within MP.	126	Town Belt land can also be covered by another Trust Deed subject to analysis by legal counsel. Was original Town Belt.	reject	-
CHAPTER EIGHT - Sectors					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan

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all	maps - misleading key "land protected by Town Belt Deed" "land to be added to Town Belt Deed"	126		accept	change text in key
1.3	pg 4 of Ch 1 final sentence. Question if complexity of each sector is recognised in each sector	215			
	Sector 1 Te Ahumairangi Hill				
8.1	Introductory section should more prominently cover the past history and naming of Tinakori hill rather than just a footnote.	215	description of tinakore is described in 8.1.6. Can add in here the previous name	accept	add the previous name in the text
8.1.1	most Wellingtonians have no idea where Te Ahumairangi hill is. Education programme promised never eventuated. Signage is meaningless.	32		noted	
8.1.1	Inappropriate use of the term reserve . Should be management sector	215		accept	change wording
8.1.2	Stellin Memorial gifted " upon trust " in 1964	250		noted	
8.1.2	WCC supports the 50th Anniversary of Stellin Bequest and acknowledges the land with signage	101, 120, 126, 178, 209, 210, 226	Probably best that the group applies to the grants committee for funding for the history project etc.	noted	
2.7 & 8.1.2.1	addition of Western Slopes appears marginal unless additional criteria	73	SEE RESPONSE Ch 2		
8.1.2	Land from Stellin should not form part of Town Belt deed.	126	The land was original Town Belt. The policy proposes that the Park be managed under the Town Belt Management Plan. It is proposed that the land be included as legal Town Belt in the proposed Town Belt bill. There is no legal impediment to the Park being included in the legislative change.	reject	
8.1.2	Good to have the Northland block added to Town Belt	54		noted	
8.1.2	Support proposal to legalise the section of road that encroaches on Town Belt. Don't want any street widening or upgrading.	8		noted	Road widening is outside the scope of this plan.
8.1.2.1	Ramifications of making Weld Street legal road and the likelihood of intensive development	171		noted	The activities that occur as a consequence of the road being declared legal road are covered by the provisions in the District Plan.
8.1.3.3	Remove wilding pines from western slopes	120		noted	

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8.1.4	Appears one of only two sectors with a policy that commits Council to animal pest control and control of exotic weeds. Also contradiction between landscape policy 8.1.3.3 which refers to gradually removing the wilding pines from the western slopes and the statement that removing them is not a high priority 8.1.4	95	change original text and policy 8.1.3.3 to remove reference to pine tree removal.	accept	
8.1.3.2	Support long term pine removal and restoration to native forest but believe nature should take its course. Entail tight control on pest numbers.	120		noted	
	More attention is given to ecological development and health and be of benefit to Otari.			noted	-
8.1.3.2	manage conifer removal based on hazard programme and removal take place bi annually.	43	Current programme is based on a long term risk assessment programme and available funding .There will be no regular removal programme on Te Ahumairangi.over the next ten years	reject	
8.1.4	Delighted at survival of large trees including sycamore. No more major tree removal. All wind blown trees left on site. .	32	there will be ongoing tree removal as trees decay and die This will primarily be small scale arboricultural practices.	reject	
8.1.4	More attention needed to health of Town Belt which would be of mutual benefit to Otari forest.	188	there is already a focus on the linkages between the two sites	noted	
8.1.4.1	No provision for ongoing maintenance of revegetation	171	Need to look at the ongoing maintenance of the rata plantings.	noted	
	I like the native plants that are now filling the areas	54		noted	
8.1.3.5	Deciduous woodland means principle 5 risks being compromised. No rationale for this policy in the plan.	43	Principle 5 does not suggest that the Town Belt vegetation will be only native but that the Town Belt will support indigenous biodiversity	reject	
8.1.3.6	Built structures located on the hill will not be extended beyond the current height level except after proper notification and consultation	43	The Rules identify the process for the construction of buildings and structures on Town Belt.	reject	
8.1.3	Oppose removal of group of pines at bottom end of Wadestown Road.	32		noted	
8.1.3	Bush walk needs attention to the tracks. It is overgrown. Are between Orangi Kaupapa and Wilton needs landscaping and the grass to be cut.	21	passed onto Parks Operations	noted	
4 & 8.1.3	no reference to felling of "inconvenient" trees. Provide shelter, shade, manage water, erosion, habitat.	32		noted	-

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8.1.4	Biodiversity relates to a mix of species not just natives. Applaud retention of all flora and fauna. Beech forest planted by Cockayne in valley behind Elephant rock should be replanted in beech trees.	32	Programme for Te Ahumairangi is that it will revert to native forest. Beech trees are not native to Wellington city	reject	
8.1.5.1	Allow further access for mountain bikes on eastern side of hill	3, 29, 53, 94, 117, 141, 158, 169	Need to assess the implications of this given there has been significant concern from other users. Also we need to follow the process in the Open Space Access Plan. Proposed to retain the status quo with no further track opened for bikes.	partly accept	
8.1.5	consider MTB access on city side of Hill - allow commuting. Could assist with track maintenance	117	The northern walkway between St Mary Street and the summit is already open to mountain bikes.	noted	
8.5.1	do not support MTB	120			
8.5.1	support increased access to mountain bikers	130	-	noted	-
8.1.5	no more tracks for mtb	32			
8.1.5	support - opening more tracks would discourage illegal use	3	-	noted	-
8.1.5	support better mtb tracks - currently too steep	94	-	noted	-
8.1.5	support mtb by controlling speed	158	-	noted	-
8.1.5	Designate existing walking tracks as dual use and support managed trail building.	52	most tracks are dual use and are designed for that use.	noted	
8.1.5	The summit ridge road has never been fixed following logging. Resurfacing should be a priority.	32	The surface is currently fit for purpose.	noted	
8.1.5	Extend tracks for bike commuting from adjacent suburbs	54	There are already pretty good commuter links between Wilton/Wadestown and Thorndon through the Hill.	reject	
8.1.5.1	More focus on mountain bike tracks. Tinakori currently off limits to biking	11	Te Ahumairangi is not off limits to biking although where they can go is limited.	reject	
8.1.5	Oppose increased use by bikers. Causing considerable track degradation. Need to separate bikers and walkers if there is room	234	Separation only occurs on specific down hill routes. Otherwise dual use prevails. Not possible to always separate walkers and cyclists	reject	
8.1.5.1	Do not support the increased use of tracks for mountain biking. Further thought needed	120, 193, 32, 234		noted	
8.1.5	Proposed future track link via Monmouth Way not the best link from the hill to Otari Wilton's Bush. There are better minor tracks to be considered originally built by Grant Preston Thomas	171	The track link already there but low priority for formalising .	reject	

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8.1.5	Other users are being given insufficient protection. An assessment of Mothers with buggies and the disabled. In addition a treetop viewing platform would increase the tourism potential.	43	There is already a viewing platform at the southern end developed as part of the landscape plan implementation. The ridgeline track is suitable for buggies.	noted	
8.1.5	dog owners must have a facility for dog droppings	43	The current policy is not to provide dog bins but for users to carry out dog droppings.	reject	
8.1.5	Take active steps to avoid track erosion. Increase usage and visitation of the hill to a wider group of residents and visitors.		A regular assessment is carried out on track quality and maintenance carried out as required.	noted	
8.1.5	Support the idea of community gardens near Grant Road.	94	These types of activity need to be community driven. There are limited sites suitable for such activities on the Hill.	noted	
8.1.5	Conflict between being least developed sector and opening it up for bikes	215	The Hill is partly open for biking	noted	
8.1.2	Support land additions	120, 209, 214		noted	
8.1.2	Support addition of Rangiohua land to Town Belt	238		noted	-
8.1.2	Acquire private land below Bank Road	95, 120, 126, 141, 144, 145, 159, 178	Officers have assessed the land and identified that it has landscape and ecological values but would be a low priority for acquisition for addition to Town Belt particularly given its current outer residential zoning and the protection afforded by the steepness of the site. Recommend that other forms of protection such as covenants be investigated first.at time of any proposed development	reject	
8.1.5	Develop track link between Bank Road and Stellin Memorial Park	48, 144, 158, 178	Identify as a potential track linkage, but not a high priority especially given it is across private land and of very steep topography.		Identify it in the plan
8.1.5	Could a sign be added at Monmouth Way indicating the track into the Town Belt	243		noted	
8.1.5.2	Recommend pedestrian access be established down to Cecil Road via a Council easement at 173 Cecil Road	120	Already link at end of Cecil Road. This link is through private land with no easement.	reject	no change
7.1? & 8.1.6 & Ap3 & etc	McCleverty land - many references to the land transactions. Interpretation of facts continues to be revised	32		noted	
8.1.2.1	Do not include western reserves and adjacent reserve areas as never part of trust deed.	126	Is important and integral part of what the public see as Te Ahumairangi hill. It fits the criteria outlined in 2.9.4.	reject	no change

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8.1.2.1	The inclusion of Western Slope Reserves appear marginal. Maybe needs to be an extra criterion about strengthening links with nearby areas of ecological value.	84	The area fits within the criteria and in particular is contiguous with Town Belt.	reject	
2.7 & 8.1.2.1 & 8.3.2	non TB land - may be cheaper to manage as reserve eg Western Slopes - like George Denton Park. no benefit in adding non horseshoe shape land	95	SEE RESPONSE Ch2. the actual costs for adding to town Belt relative to the overall project are small and will tidy up the land and its future management	reject	
8.1.2 or 8.1.6?? & Ap4	origins of "Tinakore" conflicts with 1840 map on page 208 (Ap 4)	250	The map was developed after the settlers had moved to this site from Pito one and the much recorded naming of the road makes sense given the derivation of the wording.	noted	
8.1....	Oppose closing Grant Rd. concern about changes to existing licence agreement to use part of road. Encroachments are prohibited activity on TB. Would future owners get an encroachment?	13	Consultation identified several long established encroachments onto the unformed legal road with licences to occupy.	accept	It is recommended that the area not be added to the Town Belt at this stage. The Council will review all uses of this unformed road and develop options for its long term role as a buffer for Town Belt, whether some or all of the road should be stopped and whether some of these areas should be sold to adjacent property owners.
8.1.6	trail described by Abel Dottin Best in 1840 is still there though ill defined (from Pipitea St to Otari and Takarau Gorge to Makara Beach	32		noted	
8.1.6	Ahumairangi - interp / significance acknowledge neither controversy or possible connection with 1841 proclamation			noted	
8.1.6	Many historic and archaeological sites should be sign posted.	32	no plans for further signage at this stage	noted	
8.1.6	The pump house would make an ideal museum. The pump house or the caretakers house should not become commercial premises	32		noted	
8.1.6	Feature is Kohatu Quarry with remains of the magazine	120	add in information on this.	accept	
8.1.6	Preservation of the Nathan Fountain in Goldies Brae/Grant road needed.	43	plan notes that work on this fountain will occur following a restoration plan page 59	noted	
8.1.7	Remove the remains of the netting between the maintenance road and 1 Wade (Wadestown?) street	243	Passed on to Ranger team to resolve	noted	
8.1.7	Encroachment at 1 Wadestown Road remains and has not been removed. Remove as a matter of urgency	120	see above		
8.1.6	Above Glamorgan street trench is a 20 metre long trench possibly associated with gold prospecting.	120		noted	

	Sector 2: Kelburn Park				
8.2.1	Park area over the motorway is not well cared for. Track from Boulcott Street badly needs some maintenance.	32	passed onto the tracks team	noted	APPENDIX 2
8.2.1	Reference to isolated part of TB not correct	215		accept	
8.2.2.1	Land along Salamanca road should be taken into Town Belt but do not support road widening.	214	Any road widening will be within the existing road corridor. The issue here is that the legal road corridor covers part of the area managed as Town Belt including the corner of the tennis courts.	noted	
8.2.2.1	Recommend land owned by NZTA above Terrace Tunnel be considered for inclusion into Town Belt	214	has been considered but after discussions with NZTA the status quo remains	noted	
8.2.2.1	Support adding accessway to Town Belt	214		noted	
8.2.2	Clifton Terrace part of original Town Belt. Disagree with 8.2.2.3	215	policy 8.2.2.3 identifies the need to bring PNBST into any discussions over former Town Belt land given their RFR status as well as the partnership approach outlined in the principles.	reject	
2.7 & 8.2.2	suspicious of Council's intentions. It has tried to sell Clifton Terrace twice in past. Clifton Tce "low-priority" for adding to TB - concern attempt to sell again	184	SEE RESPONSE Ch2		change 8.2.2 & table 2
2.3 & 8.2.2	legal opinion around ownership of Clifton Tce land. Various land transfers. Held for people of Wellington. Legal opinion would only apply to Crown land	28	SEE RESPONSE Ch2		
8.2.3.4	Support protecting cabbage trees. They are not looking in good condition	214	Passed onto the tree team for assessment	noted	
	Sector 3: Aro Valley				
7 & 8.3.2 & 8.3.3	Careful consideration given to rationalisation around Aro Valley - its effects on heritage values and character of valley	72	Proposed to add more land in Aro Valley into management plan for Town Belt	accept	additions to Sector 3
8.3.4	The addition of several dedicated downhill and mb tracks should be actively supported.	105	There have already been major track developments in this catchment	noted	
8.3.2	Add more land in Aro Valley eg Te Aro School	168, 163	Agree with submitters – part of Te Aro School a priority for return to Town Belt subject to discussion and agreement with the Ministry of Education, Te Aro school and Port Nicholson Block Settlement Trust. Amend description of values in plan.	partly accept	Add more land to Aro Valley sector. Change wording around Te Aro School
8.3.2	Makes sense for the whole watershed of Polhill to be managed within one framework	105	reconsider putting the overall area of the catchment into TB.	accept	

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8.3.2	Consider Polhill on its merits without reference to historic boundaries. Add Polhill to Outer Green Belt.	112	Officers recommend that the additional reserve areas in the catchment be included in the Town Belt Management Plan and be added to the Town Belt through the legislative process. These include all of those reserve areas proposed for addition to the Town Belt in the 1995 plan. It is important that these reserve areas be treated and managed as one unit. Remove policy 8.3.3.2	reject	
8.3.2	The City to Sea Walkway should be routed through Polhill Gully and Aro valley reserve to include the additional TB.	105	Not practical . It will bring the track on a major detour and increase in elevation only to drop down again to Central Park. Already a good number of tracks here that can be used in conjunction with the walkway.	reject	
8.3.2	garage between 107 and 117 Kelburn Parade be removed to raise the profile of Adams Terrace Gully.	120	Leases policy already has a clause around the future issuing of licences on road adjacent to TB (clause 5.8). This will manage the future maintenance and removal of the garage.	reject	
8.3.3	Remove more mature pines from above Norway street when the opportunity arises after storm damage.	136	will be consistent with policy 4.3.10	noted	
8.3.4	support further development of downhill mountain bike tracks in this sector.	29	new tracks are currently being developed in the area proposed to be included in the plan.	noted	-
8.3.4	Add walking track from Kelburn Parade to Aro Street	136	useful addition to links through Town Belt.	accept	add in new policy
8.3.4	Might be possible to construct a track up thro Polhill A and B and enable access to Essex Street	112	Track crosses private land and would seem to be a low priority given the terrain and the nature of the link.	reject	
8.3.2.1	A more formal walking track be constructed through Semeloff Terrace reserve to increase its recreational value. Local community keen to help build a track.	112	could link up with the proposed track outlined above to Kelburn Parade. . Check out both options.	accept	add to new policy above
2.7 & 8.3.2.2	reject removal of any TB land from Deed eg Boyd Wilson	214	SEE RESPONSE Ch2	accept	remove 8.3.2.2
8.3.4.3	oppose policy on assessment for removal of Mitchelltown toilets	112, 136, 201, 214	agreed after visit that we should secure and retain the block	accept	8.3.4.3 Change to " The existing toilet block shall be secured and retained
6.4.3 & 8.3.2.2	support keeping existing accessways eg Boyd Wilson Strip	103	agree	accept	keep Boyd Wilson strip in TB. Delete 8.3.2.2 and last row Table 3.

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8.3.4	City to Sea walkway - should go through Polhill Gully/Aro Valley - reduce travel on streets	107	Not practical. It will bring the track on a major detour and increase in elevation only to drop down again to Central Park. Already a good number of tracks here that can be used in conjunction with the walkway.	reject	-
8.3.4 & 8.1.5	signs need upgrading - Northern & City to Sea Walkway	107		noted	-
8.3.2	Gully below Hadfield Grove - oppose change from 1995 plan - from "potential addition" to "Council will not pursue acquisition of lands". Kaka population, horseshoe shape. retaining or reclaiming these areas consistent with Central City framework - cross-valley links, community participation in re-greening city (Biodiversity Action Plan)	214	The area is a low priority for acquisition because of its zoning as outer residential, its location and poor access. The steepness of the land will limit development oportunities. The land does have landscape and biodiversity values	noted	
Sector 4: Brooklyn Hills					
8.4.2.1	If these land parcels are held as reserve already protected and no need to add to the deed.	126	The proposal was to have consistent status for all land managed as TB and to have it managed under one legislative regime.	reject	
8.4.2.1	Agree with all of these lands being added to Town Belt	32,189		noted	
8.4.2.2	Do not remove two small pieces of sections on the corner of Nairn and Brooklyn Road from Town Belt	103, 189	These are very small areas isolated from the Town Belt with primarily value as road reserve.	reject	
8.4.2.2	Disagree with removal of these areas from Town Belt	32,189	see above. The corner of Brooklyn Road and Washington Avenue is seen visually as road reserve and part of the residential frontage of Brooklyn Road. The steepness of the land will ensure the protection of the vegetation.	reject	
8.4.3	Bury the proposed reservoir	103	Current policy is to bury reservoirs 8.4.3.4	noted	
8.4.2	swords club already sharing resources and facilities	161		noted	
8.4.2	Opposed to pine removal above Hutchison Road.	32	It is likely that this area will not be removed as a large scale forestry project but there will be groups of trees removed as they become hazardous.	accept	change to text in 8.4.3
8.4.3.4	support	32		noted	
8.4.3.5	support	32		noted	
8.4.3.3	I support 8.4.3.3 The site has been denuded in recent years and replanting deciduous trees would add to the site's amenity. Like to see an orchard here.	32	Community orchard and garden development is assessed on a case by case basis. Parts of the site is quite exposed and would not be suitable for deciduous tree planting.	noted	

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8.4.3	Moister gullies likely to be of ecological importance where it may be possible to establish lost species.	95	will review long term planting priorities as part of ecology section review	note	
8.4.3	Support removal of pine trees and restoration with natives. Pine trees above Hutchison Road need to be removed for public safety.	197	see above. Slight change in wording to emphasise the changed focus to small scale removal as required for safety purposes	noted	change to text in 8.4.3
8.4.2	Support adding 67 and 67A Epuni Street	103		noted	
	Important that concerns over roading access and lighting are considered at Te Whaea. Management of lighting could be improved to reduce glare.	197	Passed on to Sportsfield team	noted	
8.4.4.1	support in regards Prince of Wales Park			noted	
8.4.4	Support retention of Scottish harriers building	103		noted	
8.4.4	there are two changing rooms not referenced in plan	103		noted	
8.4.4.2	Swords Club want to be involved in any discussions on future of former bowling greens at Tanera Park	161	Passed on to sportsfield team	noted	-
8.4.4	Friends believe there is scope for greater multiple use for the large area occupied by the Renouf Tennis Centre	215	Current policies 6.6.4 will encourage clubs to maximise use of facilities and where practical to share with other codes.	noted	
8.4.6.3	access encroachment via Wright Street rarely used apart from by maintenance vehicles.	103	error on plan. The encroachment is thro the Park to houses on Salisbury Ave and Westland Rd.	accept	change 8.4.6.3
8.4.3	Appalled by wholesale tree felling in this area. Should be no more clearfelling and if necessary underplanting done first to ensure no bald patches. Advice in Boffa report ignored. .	32		noted	
8.4.4	Plan needs to recognise the need for upgrading and maintenance of the Renouf Centre and allow for positive engagement and agreement over leasing plans	111	The Plan will enable development of the complex, subject to the criteria in 9.5. However the footprint of the Centre given its location cannot be expanded	noted	
8.4.3	Tennis Central wishes to be consulted over plans to upgrade the landscape above the centre	111		noted	
8.4.4	Tennis Central does not wish to be limited to the existing footprint or leased area. Needs to be a managed activity.	111	The Plan will enable development of the complex, subject to the criteria in 9.5. However the footprint of the Centre given its location cannot be expanded	reject	
8.4.5	all accessways are well used and should become part of TB	32	all accessways currently on TB.	noted	

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8.4.5	review TB policy regarding minor encroachments such as at 92,94 96 Nairn Street. We ask what kind of agreement would the Council be willing to form with current owners. if they did grant an easement would they extend it to an adjacent neighbour?	208	Encroachments are identified as a prohibited activity. The Council will consider granting encroachment licences for managed removal where immediate removal is not possible and/or practicable.	reject	-
Sector 5: Macalister Park					
8.5.1	Exhibitions Act should be revoked and showgrounds area revert to Town Belt. Proactive approach required for instance if Te Whaea move.	32, 76, 82, 231	Will keep a watching brief regarding the Premises lease	noted	
8.5.1	Will the former Showgrounds site have the TB suspension lifted if the present use terminates	217	correct	noted	
8.5.1	thought showgrounds use should have reverted to TB once not being used for original purpose	32	Managed under Premises lease. Legal advice is that the use is consistent with the Exhibitions Act.	noted	
8.5.3.2	wording indicates it may be a long time before any native plants are well established on the slopes		The establishment of natives will be related to the speed of tree removal. This may take some years.	noted	
8.5.1	Friends believe the Winter Show buildings should have the suspension from the Town Belt managed as a special area within the proposed TB bill.	215	The Showbuildings are covered under a separate act.	reject	
8.5.3.3	Support retention of eucalypts but need clarification of the word manage.	32	add in" manage could include specific pruning for tree health and hazard removal and the removal of dead and dying trees".	accept	add a footnote to this policy to confirm what is meant including the specific pruning for tree health and hazard removal and the removal of dead and dying trees".
8.5.3	Clearfelling of ridgeline has resulted is no longer attractive and now not sheltered from winds. Imposing conifer trees along Finnimore provide a broad corridor and shelter and shade. No further tree removal in this area.	32	further tree removal in this area will be based on a hazard assessment of individual trees and/or tree stands. It is likely that large conifers will be removed alongside Finnimore Terrace at some future time.	reject	-
5.5 & 8.5.3	underused, informal grass areas - should revert to wilderness with some planting. Stop mowing gorse eg above Liardet (Hutchinson/Dransfield)	82	SEE RESPONSE Ch5		
8.5.2	Agree Mt Cook play area should remain TB. As well as two small areas along John Street/Hutchison Road.	103		noted	
8.5.4	Fantastic opportunities for commuter routes thro Macalister Park and Brooklyn thro to CBD. And thro Golf course to connect up with Mt vic.	141		noted	

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8.5.4	Ability to develop existing facilities thro a transparent and efficient process needed and supported by WRFU. View that sporting clubs be incentivised to invest in their facilities Suggest 25 year lease would reflect the true life of the buildings. Also the plan needs to preserve the ability to develop new community facilities should new sports emerge.	197	Current Leases Policy has the flexibility to consider long-term leases. The Council propose a lease term in the Drafting instructions up to a maximum lease term of 20 years. . The management plan will be consistent with that proposed.	accept	identify new process chart and add to appendices. Change any reference to lease term to 20 years maximum.
Sector 6: Golf Course/Mt Albert					
8.6.2.1	Note subtle language change here to the imperative but find no justification. No objection in principle.	32	change to be consistent with other policies		To regularise the legal road alignments at:.....
8.6.2	Support inclusion of Tawatawa ridge and Sinclair Park. Many archaeological sites in this area	32	Tawatawa & Houghton Bay are not part of the horseshoe shape. They do not have a visual connection with the inner city suburbs or CBD. Neither are they part of the original Town Belt. Do not include Tawatawa Reserve and Houghton Valley reserve in Town Belt Management Plan.	reject	Different catchment not part of the inner city horseshoe
8.6.3.1 and 8.6.3.2	Support provided outside advice is sought. Advice should be open to public consultation.	32	Officers will assess the level of outside advice required on a case by case basis.	reject	
8.6.3.3	erect signs to warn golfers of possible approach of pedestrians	32	It is a golf course so walkers need to look out for golfers	reject	
8.6.3.4	support	32		noted	
8.6.3	OMB behind Hockey Club extensively sprayed in past 5 years. Manual surgical approach needed for its removal	154	passed onto operational team	noted	
8.6.3.	The Council needs to pay more attention to work of community groups. Monitor and control contractors better in efforts to control weeds	172	Already have MOU's with all groups and regularly monitor their work programmes.	noted	
8.6.3.5	oppose the replacement of the historic and healthy pines.		The policy could be amended to clarify its intent:		Retain the parkland character and historic pines around Newtown Park.
8.6.4	expand the zoo to enable a proper zoo to be built.	246	There are no plans to extend the zoo. The management is limited to the current site	reject	
8.6.4	walking tracks do not cater for the less able person. The excellent walk track at Karori Park could be replicated at other locations such as Wakefield Park.	91	Look at the opportunity here for a walking track and a playground		add into the text re Wakefield Park on page 125 another bullet point. "Possible development of an accessible community walking track around the park and playspace for children"

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8.6.4	Concerns about fencing around Wakefield Park that restricts public access	243	The area is fenced but there are several gates around the ground and it can be accessed when not being used.	noted	
8.6.4	strongly support proposals to increase biking on tracks in TB and increase number of tracks.	181		noted	
8.6.4					
8.6.4	orchards and similar projects excellent use of Town Belt.	180		noted	
8.6.4.1	Support	32			
8.6.4.1	Supports develop of multi function facility at Wakefield Park.	61,62		noted	
8.6.4.2	must be public consultation on any changes at Berhampore. Land should remain parkland, not used for mountain biking (noisy, destructive)	104	There are no plans to change the use of the golf course. If there are any major changes the proposal would be subject to public consultation.	noted	
8.6.4	Friends remain concerned at prospect of new development for clubs using the artificial field	215	Any new development would be assessed against the criteria in 9.5.1.	noted	
8.6.4	Plans shows Dual Slalom track not endorsed by the friends/ was agreed to on a temporary basis.	215	Noted that the Friends were informed that the structure was going to be kept long term.	reject	
8.6.4.2	Golf course is underutilised Close it and transfer members to Miramar. Replant golf course in natives.	34	Policy 8.6.4.2 will ensure the future size and configuration of the Golf Course will be assessed and that current and potential usage will be a key part of this assessment.	reject	
8.6.4.2	Moratorium on spraying chemicals on the golf course. Very dangerous road for cycling. Look to remove parking on east side and also use the old golf course carpark. Many bike this way so need to put in a safe cycle path.	205	The policy 8.6.4.6 to investigate the sporting hub development will also investigate parking options. Policy 8.6.4.4 will look at getting commuting cyclists off the road as much as possible between Island Bay and the CBD. Use of chemicals is only carried out when necessary to manage the turf.	noted	
8.6.4.4	Off road commuting links thro this area are of interest to this club. Fantastic opportunities for off road routes thro Macalister Park and Brooklyn to the CBD. Trails both sides would make a popular loop.	141, 146, 181		noted	
8.6.4.4	Recommend development of off road routes thro Town Belt be given priority.	146	Consultation on proposals going out in the 2013/2014 year	noted	
8.6.4	TB around our property feels part of our home. wonder how sustainable the golf course is. Love to see more native plantings on the upper slopes.	205	Policy 8.6.4.2 will ensure the future size and configuration of the Golf Course will be assessed and that current and potential usage will be a key part of this assessment.	NOTED	

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8.6.4.5	Number of plans to develop Hockey Stadium including additional surface, covered seating, pavilion, café, parking etc. No further buildings needed. Understand we need to discuss to fully understand the implications for commercial use outlined in the plan. like to investigate developing a sculpture park in grounds of stadium.	196	Any new development would be assessed against the criteria in 9.5.1.	noted	
8.6.5.1	support	32		noted	
8.6.5.2	support	32		noted	
2.7 & 8.6.2	inclusive - except retain "horseshoe" shape - does not seem to justify exclusion of important green spaces such as Tawatawa reserve	129	SEE RESPONSE Ch2	-	-
8.6.6	House on Quebec Street encroaches on one of the main access tracks up from the golf course.	32	It does not encroach. The link is through the adjacent Tapu te Ranga land .The track encroaches on this land.	reject	
	Sector 7: Newtown/Crawford Road				
8.7.2	agree that Government House should if ever available be returned to Town Belt.	103		noted	
8.7.2	retain Hospital Road reserve in Town Belt.	103	Is original Town Belt in Council ownership. Why would we not put it into the Deed?	accept	Page 148. add this to the Deed as part of the bill.
8.7.2.1	support additions listed	32		noted	
8.7.2.1	If these areas are held as reserve need not be belatedly added to the Deed.	126		reject	
8.7.3	carefully describe curtilage of Chest Hospital as it is the open space around the buildings that contributes to its open space values.	72	The curtilage will be defined primarily as the leased area being lot 4.	accept	policy 8.7.3.2 amended to add "the Nurses Hostel , the covered walkway linking the two buildings and the curtilage will be recognised."
8.7.3	do not support retention of Chest Hospital as a special area. Development on site would require additional car parking more buildings etc.	4	Special area recognises that the future uses may need to be more flexible and may not strictly speaking fit with the overall intent of the Town Belt Deed to be managed as a Recreation Ground.	reject	
8.7.3	Is it clear that while land will regain TB status it is only lot 4 that will have special status.	217	Agreed	accept	define actual area in drafting instructions
8.7.3	how will historic character of Chest Hospital be available to the public if leased to SPCA? Will it have impact on traffic.	36	There will be access around the outside of the hospital and for those using the services of the SPCA, access into the hospital. Traffic impacts will be assessed through any resource consent requirements.	noted	

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8.7.3	Former Chest Hospital is adequately protected without being added to Trust Deed. Include in MP	126	The Council agreed that the Hospital be added to Town Belt when it was acquired in 2002.	reject	
8.7.2	add Truby King Park to TB. Could also be managed as a special area like the Zoo.	215	Truby King has its own management plan and is managed as a heritage house and garden. It is classified as historic reserve under the Reserves Act. There is no advantage in adding it under the Deed simply to partly take it out as a special area.	reject	
8.7.2.2	support reintegration of College lands back into TB.	215, 217		noted	
8.7.... & Ch9	encroachment - bans permits for new tenants & owners (Carmichael). Similar eg Bell Rd & Upper Wadestown. Needs to be made clear - Private access to homes.	150	Residents can apply for an encroachment licence under the proposed policies. No change to the policies. .	noted	-
8.7.6	support policy. Make part of southern walkway safer for walker/runners. Recommend fenced garden with trampoline about Kotinga St & below Truby King house be removed	120		noted	
8.7.2.1	support return of Chest Hospital	215		noted	
8.7.4	bare hillside behind Owen Street shows flawed thinking with clear felling causing erosion and poor establishment of natives.	32	Will review the removal and replanting programme	noted	
8.7.4.1	stumped by the word manage? Clarify	32	manage can mean the range of maintenance practices including planting, weeding, pruning selective removal and so on.	noted	
8.7.4.2	oppose. All of conifers should be retained.	32	Tree removal will in the future be small scale rather than large scale clearance. This area will only be removed if the trees become a hazard. .	reject	
8.7.4.3	support	32		noted	
8.7.6.1	support	32		noted	
	Sector 8: Hataitai Park				
8.8.2	Recommend two minor amendments to clarify the policy 8.8.2.1 by adding onto the endto the greatest extent possible while still ensuring that the expected transportation improvements can be delivered.	113	There is no need for any change to the policy which is quite clear in its intent that the Council will work to mitigate the impacts. Section 8.8.2 already outlines the Council's position with regard to the Airport to Mt Victoria improvements.	reject	
8.8.2.1	Needs to mention mitigation from the Kindergarten and pedestrian access over SH 1 as a result of road widening.	214	In general terms the current policy does include the reduction of mitigation on all activities and assets on TB. the bridge supports access to the Park.	reject	

8.8.2.1	Support	217		noted	
8.8.2	The draft plan seems to accept or favour roading solutions over preservation of TB. Feel these remarks should be removed. Wording should be stronger for instance " the Council will ensure that NZTA gives the pedestrian - oriented recreational environment of the TB the priority it deserves and compensates for it	214	The issue of compensation of land lost is already linked to 2.9.3 which identifies any land lost shall be compensated by other land suitable for TB purposes. NZTA is able to acquire the lands it requires under the Public Works Act. On that basis the Council will work to minimise impact on and get the best possible outcome for the Town Belt.	noted	APPENDIX 2
8.8.2	amendment to explanatory text on page 150 by adding at the end of the sentence will need to make decision on its role as trustee under the Town Belt Deed 1873 having regard to the provisions of the PWA.	113	Confirm this can be added.	accept	add footnote to explanatory text
8.8.2	Sequestration of TB land is of great significance and must be publicly notified separately.	32	No decision has been made yet on the process to be followed. Whatever is decided it will be quite clear that the proposal requires the taking of some Town Belt lands.	reject	
8.8.2	concerned that earthworks related to widening of Ruahine street may affect mountain bike trials. Funding needs to be available to replace them.	141, 146	Need to review the MB areas and how these would be affected by the build.	noted	
8.8.2	If NZTA takes more land then the Council would try to obtain more land from the crown for net gain.	111	Land recovered will be for a range of values and will not only be based on size. The land needs to be of equal or better, recreational, ecological and/or cultural value.	noted	
8.8.2	The Council could try to obtain more land from the Crown so we have net gain on land.	45	see above comments	noted	
8.8.2	note Council's fiduciary obligation to ensure no thoroughfare. Also note that the acquisition of 6ha is outside the existing designation and contrary to trust deed. What action has the Council taken to protect the TB from loss. Surprisingly the Council has not consulted more with stakeholders . Can you outline how the Council proposes to exercise its trustee duties in this respect. Also surprised at the Council's indifference to the acquisition of 6ha of TB for roading.	216	The Council's position as trustee is outlined in policy 8.8.2.1 that is to reduce the impacts of the proposal. This could include getting other Crown land as Town Belt as some of the compensation. The Crown can take the land under the Public Works Act so the policy identifies an approach based on the above policies. The current review of the management plan has identified the Council's approach. Any specific proposal would be subject to further consultation and review by the Council.	noted	

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8.8.2	Strongly object to the proposed displacement of recreation activities without a solution proffered on behalf of Council. Such a solution would need to include equivalent facilities		These discussions will take place once the final option for the road is confirmed and will involve both temporary and/or permanent displacement as a result of the road.	noted	need to add in the possible effects of the construction itself and the loss of spaces, facilities during this time. Add to bullet points in 8.8.2
8.8.2	if NZTA widens Ruahine Street would there be merit in making a slip road from Alexandra Road?	111	There are some major issues that will need to be considered with this proposal. Feasibility (inc costs) will need to be carried out. In addition the impact of this road on Alexandra Road and associated intersection will need to be considered as well as likely impacts on parking on Alexandra road.	reject	The Town Belt subcommittee have recommended that Alexandra Rd should not be used as alternative vehicular access (except for utility vehicles) to/from Hataitai Park."
8.8.2.2	stronger wording used such as "oppose and challenge the necessity of, and then, if lost, ensure its replacement" In addition the Council should look to seek compensation from the crown through increased funding for the conservation of city green spaces. Crown taking land for road is far more contradictory than taking land for education purposes.	214	See above comments. Not sure what is actually meant by funding conservation of city spaces. There may be specific mitigation packages associated with the road development quite separate from the land compensation issue. These will be dealt with at the time and will be related to the specific mitigation of this area.		
8.8.3	tracks round hataitai Park infested with tradescantia	106	passed onto the operational team	noted	
4.3.10 & 8.8.3	Council needs to consider its practise of cutting down trees eg Hataitai. Trees not sick - just old	32	The plan is that the mature trees will remain. There may be a need to carry out selective pruning from time to time and removal if there is likelihood of failure. This occurred with the recent removal of macrocarpa trees.	-	-
8.8.3.1	Oppose the removal of any mature conifers or other trees from the eastern side of Alexandra road	32	The plan is that the mature trees will remain. There may be a need to carry out selective pruning from time to time and removal if there is likelihood of failure.	noted	
8.8.3.2	support	32		noted	
8.8.3.3	support	32		noted	
8.8.4	WBA has proposed to add 5 courts not 3 as printed.	216	amend document	accept	
8.8.4	WFC sees benefits in an artificial surface at Hataitai Park for current and future sports.	167	Hataitai Park is not identified as a space for a future artificial turf. The future development of the Park and its facilities will be discussed by the Hataitai Park Advisory Group.	reject	

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8.8.4	entrance and exit needs to be resolved as it is dangerous and time consuming.	167	This will be reviewed by the Hataitai Park Advisory group and will be one of the central issues assessed by NZTA during the project to widen State Highway 1 at Ruahine street. Note that the Town Belt subcommittee have recommended that there be no vehicular entry off Alexandra Road.	noted	
8.8.4	Room for expansion of facilities as long as they are not stopping others from enjoying the space.	148	Will be reviewed by the Hataitai Park Advisory group.	noted	
8.8.4	NZTA/Ruahine St - would there be merit in slip road to park to ease congestion? eg Alexandra Rd	45	When NZTA release plans, we will work with them and advisory group for Hataitai Park on the best solution	noted	The Town Belt subcommittee have recommended that Alexandra Rd should not be used as alternative vehicular access (except for utility vehicles) to/from Hataitai Park.”
8.8.4	NZTA believes that an alternative access point to the Park may need to be considered.	113	There are some major issues that will need to be considered with this proposal. Feasibility (inc costs) will need to be carried out. In addition the impact of this road on Alexandra Road and associated intersection will need to be considered as well as likely impacts on parking on Alexandra road. Not supported.	reject	The Town Belt subcommittee have recommended that Alexandra Rd should not be used as alternative vehicular access (except for utility vehicles) to/from Hataitai Park.”
8.8.4	Has a significant number of public tennis courts which from time to time will require maintenance.	111	Ongoing maintenance of the courts will occur as part of ongoing asset management planning. Any upgrades or change of use will be considered by the Hataitai Park Advisory Group.	noted	
8.8.4.1	NZTA recommend change to the policy 8.8.4.1. (3rd bullet point) working with NZTA to identify future access and parking needs at the Park, and where those needs may have adverse effects on the State Highway , the investigation of alternative access points to Hataitai.	113	This wording suggests that the Council would look at alternative access to the park if the existing or modified access onto Ruahine Street has adverse effects. The major vehicular entrance into Hataitai Park must remain on Ruahine street. Any other access onto Alexandra Road would change a quiet Scenic route through the Town Belt..	reject	The Town Belt subcommittee have recommended that Alexandra Rd should not be used as alternative vehicular access (except for utility vehicles) to/from Hataitai Park.”
8.8.4.1	what is going to happen to the Velodrome?	106	Currently the velodrome is operational but in the medium term will require a substantial investment. The long term future will be discussed by the Hataitai Park Advisory Group. Will add into the text that PNP Cycling do use the Velodrome.	accept	
8.8.4.1	support advisory group	45, 111,190 , 244		noted	

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8.8.4.1	add in statement - including a WCC review of another access point into/out of the Park - possibly to Alexandra Road.	45, 190, 244	The major vehicular entrance into Hataitai Park must remain on Ruahine street. Any other access onto Alexandra Road would change a quiet Scenic route through the Town Belt.. Not supported.	noted	
8.8.4.1	PNP cycling club is not mentioned once in the report yet the future of the velodrome is being considered. Not mentioned on page 46. or in section 8.8.4.	45	Need to add in page 46 and in section 8.8.4.	accept	
8.8.4.1	Medium term vision is for the surface to be replaced/resurfaced/upgraded. Not having a velodrome is not an option. The velodrome could become the centre of Wellington cycling.	45	Be part of the Advisory Group deliberations. Add into section 8.8.4.1 additional wording in fourth bullet point.	accept	
8.8.4	Could the BMX track in Karori be located here?	45	The group have no plans to move from Karori		
8.8.4.1	add - Developing a long term sporting infrastructure and building review across the needs of the sports organisations within the park which may include rationalisation and/or sharing of facilities where possible. In particular, an assessment over the future of the velodrome.	244	agree	accept	change the 4th bullet point to the above with the additional comments on the velodrome mentioned above.
8.8.4.1	Development of a childrens playground/area to enhance whanau/larger groups enjoyment of Hataitai park whilst sports people participate in their chosen activity.	244	Not currently identified as a site for a future playground in the asset management plan. The future role of the Park with associated recreational activities will be considered by the Advisory Group.	reject	
8.8.4.1	TBMP needs to provide a planning framework for Hataitai Park. Needs flexibility - changing requirements over time.	216 & 111		noted	
8.8.4.1	Council should be proactive in promoting options for an alternative venue for badminton.	215	This will be considered as part of the final option for widening of Ruahine Street and whether badminton needs to relocate.	noted	
7.3 and 8.8.4	Hataitai Park required excavation works over 50 years ago. Because land reclaimed/artificial - expect greater level of flexibility in land use and development	216, 244	Whilst the Park was developed over 50 years ago it now has its own open space character which is recognised and needs to be protected. See policy 8.8.3.2		
8.8.4.1	Council has a trustee duty to manage this area and not relinquish responsibility to a third party. Council should consult with stakeholders first as they have the greatest knowledge. Strongly support establishment of advisory group.	216	Note the support of the Advisory Group. The groups can encourage other sports where their activities can add to and/or compliment the existing activities in the Park. Consultation between the Council, NZTA and key stakeholders at Hataitai Park will occur during the proposed road widening of SH1.	noted	

8.8	Precinct development and access (Alexandra Road)		Alexandra Rd - Proposed plan has a number of policies around Precinct development & working with NZTA on any projects.	noted	Add to policy 8.8.4.1 at end of third bullet point: "Alexandra Rd should be added as alternative vehicular access (except for utility vehicles) to/from Hataitai Park." Ensure the master plan goes out for public consultation and approval.
8.8.4.2	amend to " Protect and maintain the historic flora geological integrity, archaeological value and heritage sites surrounding Alexandra Road as part of its character as the first scenic route built in Wellington.	32	This is only about the road experience itself. The heritage and archeological sites are protected under policies in other sections such as chapter 7.	reject	
8.6 or 7	consider heritage structures at zoo	72	Zoo is not covered by the policies in the plan. Heritage structure are best protected through future listing in the District Plan heritage list.	reject	
8.8.4.1	management of Hataitai Park should be Council role alone. Stakeholders need to be consulted	216	Sport Wellington have established an Advisory Group - made up of stakeholders from park	noted	
	Sector 9: Mt Victoria/Matairangi				
8.9.2	endorse	65, 109		noted	
8.9.2	area of 3.7 ha in original town Belt, Described on page 170 and map but not on pages 160 - 162. what is its legal status and history.	217	Legal status is outlined in Table 9.	noted	
8.9.2	supports addition of former TB land Mt Victoria lookout. Addition of Lookout Road space should not affect its status. Not sure about Pt Jerningham which was never TB. It is suggested some other form of protection would be suitable.	88	This is a generic policy position to include all of the adjacent areas as noted into Town Belt. For consistency of management and status it has been proposed to include all these lands in the schedule of the proposed Town Belt bill	noted	
8.9.2	land areas not mentioned in the document between OB and Palliser Road that must be formally added to the TB.	215	check out narrow strip of land off Hay street	noted	
8.9.2.1	Mt Vic and Point Jerningham have reserve status and adequately protected. The land on lookout road should be given reserve status but it was not part of the Deed and we should not pretend it was.	126	This is a generic policy position to include all of the adjacent areas as noted into Town Belt. For consistency of management and status it has been proposed to include all these lands in the schedule of the proposed Town Belt bill	reject	
8.9.2.2	what purpose would gazetting the subsoil serve? Land is actually in sector 8 not 9.		Bus tunnel is within sectors 8 and 9. will add same policy to sector 8 as well. Check issues of why subsoil is removed from Town Belt but not surface.	accept part	

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8.9.3	Appears to be one of only 2 sectors with a policy that commits Council to animal control and plant pests.	95	The generic policies identify the need for possum control over the whole TB in addition identify where the priorities for site led weed control are. Look to amend slightly to make it clearer of the priorities	accept	
8.9.3	elderly pine trees at top of Pirie Street are dangerous. Support their removal and replacement with natives.	17	These trees will be assessed along with other tree stands and removed as they are deemed hazardous. The development of a master plan for Mt Victoria will identify a more detailed revegetation and replanting plan for the sector. These trees are not a high priority for removal at this stage. We may do some targeted pruning and removal work over the next 5 years (i.e. maintenance), but we won't be removing the entire stand.	noted	
8.9.3	support removal of conifers on eastern side of Alexandra Road and around Byrd Memorial	63	Pine trees will be retained until they present a hazard. Where possible pruning and selective removal will occur only as required.	reject	
8.9.3.1	plant exotics eg eucalypts on northern aspects where it is difficult to establish natives	231	do we need to recognise that some areas may be planted in exotics - where natives struggle to establish. Better techniques being trialled. see - eg on some north facing slopes where 4.3.13 large trees species supported This will be considered as part of future master planning, particularly on Mt Victoria	accept	Add a new policy 8.9.3.1 outlining the need for a long term landscape development plan for Mt Victoria which will integrate future landscape change, vegetation management and recreational activities.
8.9.3.1	support .Old access path from Robieson Street be reinstated or signposted.	32	Track could be reinstated but is not a high priority.	noted	

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8.9.3.2	what does the assisting with establishment of native forest mean? Why is coastal shrub vegetation appropriate for one of Wellington's highest peaks? No reference to it being covered in coastal shrubs.	32	Assisting could mean weed control to enable native plants to grow, revegetating with plants not currently present to improve the habitat as well as possum control to reduce pressure on the regenerating native forest. Generally, we try and revegetate areas with what was originally occurring there. However there needs to be occasional exceptions for amenity areas. The views from Mt Victoria are a major attraction, and any planting there has to ensure the maintenance of those views. The species used also have to be hardy enough to survive despite the conditions. If the area hadn't been planted in coastal shrubs, it would have been left in grass, which creates more maintenance, a less pleasant outlook and lower biodiversity values. All the species used would have been naturally found less than 500 metres away, so were the best option.	reject	
8.9.3.2	Good views. No need to remove mature trees. Consultation needed on whether conifers/eucalypts need to be retained. Do not support any felling or poisoning. Support memorial planting area. Tall species must be densely planted to protect from wind.	32	Pine trees will be retained until they present a hazard. Where possible, pruning and selective removal will occur only as required. There will be no large scale forestry type operations unless storm damage requires extensive extraction of trees.	noted	
8.9.3.4	no further spraying of poisons of the various opportunity plants on Mt Vic. Support control of possums.	32	We spray weeds only where necessary to control weedy species and reduce damage to other species.		
8.9.4.1	endorse this policy.	109		noted	-
8.9.4	like to work with the Council to further develop Mt Victoria and ensure devpt of existing tracks. Dual use not always best option in high use areas.	141	Looking to develop a long term master plan for Mt Victoria to guide informal recreation and track development and develop a long term vegetation plan.	noted	-
8.9.4	Like to see walkers and bikers separated on as many tracks as possible. Do not support further expansion of tracks as they are causing tree root and seedling damage.	142	Looking to develop a long term master plan for Mt Victoria to guide informal recreation and track development and develop a long term vegetation plan.	noted	New policy in Sector 9: Develop a master-plan for Mt Victoria/ Matairangi that looks at landscape, future plantings and rate of removal of pines, as well as recreation development and ways to reduce user conflict (similar to Tinakori Hill (Te Ahumairangi Hill) Landscape Plan (2008)

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8.9.4	Replanting efforts are blocking view from Mt Victoria and Tinakori Hill.	6	There are some views that are being compromised at Mt Victoria particularly the large mature pine trees overlooking the city. There is a need to look at their selective removal as part of long term vegetation management.	accept	
8.9.4	support MB track development	29		noted	-
8.9.4	recommend development of off road commuter routes in the TB be given high priority.	146		noted	-
8.9.4	endorse development of more single tracks and promotion of better track routing. Clear signage needed.	146	assess as part of landscape development plan.	noted	-
8.9.4.2	Support upgrading Hataitai to city walkway as cycling commute.	146		noted	-
8.9.4	Mt Victoria bowls had lease renewed last year. Droning and excessive noise comes from the club. It does not require music to play bowls. I totally object to any schemes and plans that violate the original deed.	253	The Victoria Bowls Club must comply with the conditions in their lease and noise controls and limits in urban areas.	noted	-
	The last management Plan was hamstrung by the attempts to preserve the pines on Mount Victoria and to preserve an open understory. There are plenty of native plants that could be planted in monocultures to achieve the same effect. The http://www.holtforesttrust.org.nz/ Holt forest is a great example and should be visited by your town belt planners - extensive Kauri totara, rimu kahikatea and (from memory) beech monocultures. You can achieve a sustainable carving resource for local iwi and an open understory. Get rid of ALL pines on a thirty year time frame - leave a few as perch trees to attract birds and retain a vertical structure to the regenerating forest (ie don't just fell them all like on Tinakori hill)	15	Proposal is to develop a master plan for Mt Victoria. This will look at long term vegetation management	noted	
8.9.4	Oppose mountain bikers having more opportunity to create tracks in Mt vic. Bike tear up tracks and conflict with walkers and tourists.	146	assess as part of landscape development plan.	noted	
8.8.4	Support Formation of Hataitai Park group	45	-	noted	-
7 & all sectors in ch8	seeks that the Town Belt's important heritage values and sites are recognised, protected and promoted throughout Plan	72	check sectors - are there policies on the list of historic features of significance (from Ch 7)		

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7.3 & all sectors in ch8	4 recorded archaeological sites in TB. Gun battery Mt Victoria anti-aircraft battery; Gun battery anti aircraft battery site; Building foundations - WWII observation posts; Building built to replace Clayton Building. Post 1900 so not protected by Historic Places Act 1993. Ways of recognising/protecting these sites should be included in plan.	72	Are all these sites included in plan?. Check sectors - are there policies on the list of historic features of significance (from Ch 7)		
8.9.2.1	Oppose the addition of this section of land into Town Belt as it is a driveway already used for vehicle access.	47	Land adjacent to 45 – 49 Lookout Road. Do not add this section of land which includes the formed driveway into Town Belt as 2 houses have legal access onto this driveway and it has low values as Town Belt.		add in Lookout Road Open Space lands apart from the driveway associated with easements to 28 and 30 Alexandra Road
Ch 8 - SECTORS - land to add/remove					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
	All alienated land that was once part of the Town Belt should, where possible should be reinstated	102		noted	
	8.7.2 Government House. We agree that if this land ever becomes available, the Council should negotiate its return to Town Belt.	103		noted	
	Hospital Road / Hugh Street Play Area This land has been isolated from the Town Belt, but it borders the vice-regal property. If the land that the Governor-General's residence is on became available, this small area beside the road would become the natural edge of this part of the Town Belt. We recommend retaining this area in the Town Belt.	103		noted	
2.7	oppose removal of any land in TB	90	see response Ch 2.7		
	We support the addition of additional land however we do not feel that this should be limited to 85 hectares. The Town Belt is of extreme ecological and recreation value to the city and suburbs, and should therefore be able to include all relevant green spaces without reference to the total area.	112	These additional areas fit within the proposed criteria for Town Belt (Policy 2.9.4)	noted	
	I strongly support the acquisition and protection of land that is commonly considered to be part of town belt, but not protected as such	117		noted	

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<p>In general the MOE supports the addition of land under the Town Belt deed. At this time the MOE does not support the addition of land to the Town Belt deed where the land concerned contains an operational school facility including recreation infrastructure. At this time the MOE is opposed to this policy until such time that a clear process of engagement between WCC and MOE or its representatives is specified and agreed for any future land transfer or land acquisition to the Town Belt. This submission primarily concerns areas proposed for addition or removal that are located on or adjacent to school land</p>	<p>132</p>	<p>The Council policy is to seek return of former Town Belt land owned by the Crown when it is no longer required by the Crown. The proposals relating to both the Wellington College land and part of Te Aro school relate to natural areas which do not appear to have any current use by the school .The Council is keen to engage with the Ministry to develop an agreed process for future transfer of lands .</p>	<p>agreed</p>	
<p>Any former Town Belt land now owned by WCC should be given back its TB status. Also no land outside the formal boundary of the Town Belt should be added</p>	<p>134</p>	<p>Where areas fit with the porpsoed criteria then some may well be outside of the originla Town belt layout of 1839 or of that land transferred to the city under the 1873 trust Deed.</p>	<p>reject</p>	
<p>The Have Your Say document did not include the map of land to be added to the Town Belt. It was a separate map or one had to read the entire draft plan. The map did not have an indication of land that could be added, retained, returned or taken by NZTA. I think the council has misrepresented the situation by only including the land to be added which makes them look good. It does not represent the true situation facing the Town Belt. While it may be included in the Sector Maps, it should be included in the document that most are going to read as a basis for their submission.</p>	<p>140</p>	<p>The level of detail required could not be contained within the summary document. Once the bill is drafted it will include a comprehensive schedule of lands to be added and removed. This will go out for further public consultation.</p>	<p>noted</p>	
<p>The Wellington Mountain Bike Club supports any initiative that increases the size of the town belt, in particular where these are green areas that add to the attractiveness of the town belt, and where these new areas may be used to create linkages for off-road commuter and recreational tracks.</p>	<p>141</p>		<p>noted</p>	

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<p>, I am deeply suspicious of Council's intentions. In the past it have twice tried to sell off a piece of original Town Belt to developers. I refer to the piece of land on Clifton Terrace. The draft management plan says "the Crown-owned land at Clifton Terrace - the former Correspondence School site - is not a high priority for adding to the Town belt, based on the proposed Town belt land addition criteria." I am afraid you are planning another attempt at selling this small but attractively bushed piece of land. Amid all the nice words about "protecting and adding to" the Town Belt there are a few weasel words about removing land. These are clear indications that such removal is contemplated.</p>	174	<p>Agree with submitters – Clifton Terrace is a priority for return to Town Belt. Amend description of values in plan. Ownership of Clifton Terrace land Council legal advice is that the Town Belt was not 'gifted' by the New Zealand Company. Rather, it was transferred to the New Zealand government when the British Crown gained sovereignty over New Zealand. This assumption of ownership was free from any purported trust. The effect of this is that the Council should continue to approach ownership of Clifton Terrace and the Town Belt in the same manner as it has always done.</p>	accept	
<p>4) I would be extremely disappointed if this piece of land, or indeed any of the original Town Belt land, were to be sold. If the proposed legislation allows the Council to sell off original Town Belt land who knows what it would lead to.</p>	174	see above		
<p>I consider that any areas of land which are currently vacant, small in size, and are adjacent or almost adjacent to any area that was originally town belt be considered for inclusion in the town belt</p>	189	<p>They will be assessed and considered if they adhere to the criteria in 2.9.4.</p>		
<p>We support retention of existing Town Belt land and commitment to adding to it, but also believe we should try to claim back for the Town Belt original Town Belt land –</p>	214		noted	
<p>the additions are significant and welcome.</p>	90, 176, 203		noted	
<p>caution should be exercised over adding too much land which was never part of the Town Belt. If Wellington City Council were to follow Adelaide's example of seeking World Heritage status for its Town Belt, adding land not originally part of it may affect this. If additions are made, we would recommend that they remain as close as possible within the borders of the 1873 Town Belt land.</p>	88		noted	

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	Boundaries should be mostly confined to those of 1840 to maintain the historical integrity.	237	This is generally the case but where adjacent lands adhere to the criteria in policy 2.9.4 they will be considered for addition.	noted	
	I like that the Town Belt may expand, particularly in the Mt Vic area.	65		noted	
	Grant Road. We support the Council's objectives in increasing public use and enjoyment of the Town Belt. However we do not think that adding the legal road that borders our property would particularly support this objective and the personal cost to us in terms of less secure tenure would be very significant.	13	Consultation identified several long established encroachments onto the unformed legal road with licences to occupy. It is recommended that the area not be added to the Town Belt at this stage. The Council will review all uses of this unformed road and develop options for its long term role as a buffer for Town Belt, whether some or all of the road should be stopped and whether some of these areas should be sold to adjacent property owners.	accept	
	We would therefore like to submit that the area remain an unformed legal road. This would allow us to continue to look after the area, pay the encroachment and ensures the protection of the very old gazebo (photo attached) which we believe has a heritage value. If at any point, the opportunity to purchase the land (either all of it or the lower level up to the gazebo) we remain very keen to buy it	13	see above		
	I currently have a road encroachment on the unformed part of Grant Road.	42	Consultation identified several long established encroachments onto the unformed legal road with licences to occupy. It is recommended that the area not be added to the Town Belt at this stage. The Council will review all uses of this unformed road and develop options for its long term role as a buffer for Town Belt, whether some or all of the road should be stopped and whether some of these areas should be sold to adjacent property owners.		

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	<p>I generally support the Town Belt policies being a respectful neighbour but do not agree with the transfer of the unformed Grant Road to the Town Belt for a number of reasons: 1. A big review was just completed on road encroachments and that has only just settled down. 2. Encroachment is not an allowed activity in the Town Belt – do we then have to have create a formal licence/ lease/ emcumberance- incurring hefty legal costs paid for by the ratepayer? 3. Decision making will be a lot harder dealing with Parks as it will involve parks advisors/ possibly Regional Council/ DOC (Reserve Land Act)/ local board approvals. 4. Parks do not currently have a policy or personnel to handle road encroachments. 5. The Road Stopping process is quite laborious and this should be an opportunity for the Council to consider selling that portion that is road encroachment to generate more funds.</p>	42	<p>Consultation identified several long established encroachments onto the unformed legal road with licences to occupy. It is recommended that the area not be added to the Town Belt at this stage. The Council will review all uses of this unformed road and develop options for its long term role as a buffer for Town Belt, whether some or all of the road should be stopped and whether some of these areas should be sold to adjacent property owners.</p>		
	<p>As long as the Western Slope Reserve is protected, it may be administratively cheaper for such areas to be “managed as Town Belt” as is proposed for Aro Valley/Polhill Gully/Waimapihihi Stream Catchment and George Denton Park (page 92 refers). We don't see that changing the boundaries adds any connectivity benefits.</p>	95	<p>It is more efficient to have this whole area under one governance framework for ease of management.</p>		
	<p>As they stand the inclusion of the Western Slopes Reserve would appear marginal. Perhaps there needs to be an extra criterion about strengthening links with nearby areas of particular ecological value, in this instance Otari-Witon's Bush (section 5.2 of draft).</p>	84	<p>see above</p>		

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<p>Hidden reasons for changes. For example the taking of Town Belt Land on Te Ahumairangi Hill to make a legal road to existing non complying high density development and some future high density developments being considered, all on Lands whose Deposited Plans had their legal access off Cecil Road</p>	171	<p>There is a legal uncertainty over Upper Weld Street and whether the formed carriageway and unformed road are legally road. This process is to formalise this and correct an historical anomaly.</p>	noted	
<p>I oppose the removal of the Town Belt status of Upper Weld Street (8.1.2.2) Upper Weld Street has an overgrown access to the dog exercise area at the northern end of Tinakori Hill.</p>	32	<p>There is a legal uncertainty over Upper Weld Street and whether the formed carriageway and unformed road are legally road. This process is to formalise this and correct an historical anomaly.</p>		
<p>Upper Weld Street. We support the proposal to legalise the section of the road that encroaches on the Town Belt. The current status of this section of Weld Street is a long standing anomaly and we are delighted to hear that steps are finally being taken to rectify the matter.</p>	8		noted	
<p>Protection and addition of private land between Stellin Memorial Park and Glenmore/Bank Street</p>	120, 145	<p>Officers have assessed the land and identified that it has landscape and ecological values but would be a low priority for acquisition for addition to Town Belt particularly given its current outer residential zoning and the protection afforded by the steepness of the site. Recommend that other forms of protection such as covenants be investigated first.at time of any proposed development</p>	noted	
<p>acquire land below Stellin</p>	136	see above		
<p>In respect to the policies for land additions and boundary rationalisations the Friends support 8.2.2.1 and 8.2.2.2 but disagrees with 8.2.2.3.</p>	215	<p>Agree with submitters – Clifton Terrace is a priority for return to Town Belt. Amend description of values in plan. Ownership of Clifton Terrace land Council legal advice is that the Town Belt was not 'gifted' by the New Zealand Company. Rather, it was transferred to the New Zealand government when the British Crown gained sovereignty over New Zealand. This assumption of ownership was free from any purported trust. The effect of this is that the Council should continue to approach ownership of Clifton Terrace and the Town Belt in the same manner as it has always done.</p>	accept	

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	<p>the entire watershed between Aro St, Ashton Fitchett & Zelandia should be included as an integral part of the Town Belt. It links parts of the inner suburbs, is a visible backdrop to Te Aro, has a range of new tracks for walking and MTB being developed</p>	105	<p>Officers recommend that the additional reserve areas in the catchment be included in the Town Belt Management Plan and be added to the Town Belt through the legislative process. These include all of those reserve areas proposed for addition to the Town Belt in the 1995 plan. It is important that these reserve areas be treated and managed as one unit. Remove policy 8.3.3.2</p>	accept
	<p>The Polhill Gully Recreation Reserve should be considered on its merits, without reference to historic boundaries. The Sector 3 map (page 94), however, reinforces the absurdity of basing this plan on those boundaries, rather than on current best fit. The remnant of pre-1873 Town Belt conveyed by the Trust Deed should be included within the Outer Green Belt, with which it is contiguous, rather than the Inner Green Belt</p>	126	see above	accept
8.2.2	add Clifton Tce	18,26,2 8,35,38, 40,41,7 7,92,93, 102,115 ,120,13 6, 152,155 ,156174 ,183,18 5,189,1 94,198, 209,214 ,215,21 7,255	<p>Agree with submitters – Clifton Terrace is a priority for return to Town Belt. Amend description of values in plan. Ownership of Clifton Terrace land Council legal advice is that the Town Belt was not 'gifted' by the New Zealand Company. Rather, it was transferred to the New Zealand government when the British Crown gained sovereignty over New Zealand. This assumption of ownership was free from any purported trust. The effect of this is that the Council should continue to approach ownership of Clifton Terrace and the Town Belt in the same manner as it has always done.</p>	accept
	<p>Reinstates part of original TB. I think WCC should give serious consideration to including the rest of Polhill Reserve into the TB.</p>	68	<p>Officers recommend that the additional reserve areas in the catchment be included in the Town Belt Management Plan and be added to the Town Belt through the legislative process. These include all of those reserve areas proposed for addition to the Town Belt in the 1995 plan. It is important that these reserve areas be treated and managed as one unit. Remove policy 8.3.3.2</p>	accept

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	I support the addition of part of Polhill Gully Recreation Reserve, Semeloff Tce Reserve and 20 Norway St Reserve to the Town Belt	136, 163	Officers recommend that the additional reserve areas in the catchment be included in the Town Belt Management Plan and be added to the Town Belt through the legislative process. These include all of those reserve areas proposed for addition to the Town Belt in the 1995 plan. It is important that these reserve areas be treated and managed as one unit. Remove policy 8.3.3.2	accept	
8.3.2	Add Raroa Reserve as adjacent to Town Belt with regenerating bush	136	Add Raroa Reserve to the Town Belt and manage under the Town Belt Management Plan.	accept	add Raroa
8.3.2	Add Polhill 1 and 2 and adjacent native bush areas and areas of private land	136, 182, 189	Officers recommend that the additional reserve areas in the catchment be included in the Town Belt Management Plan and be added to the Town Belt through the legislative process. These include all of those reserve areas proposed for addition to the Town Belt in the 1995 plan. It is important that these reserve areas be treated and managed as one unit. Remove policy 8.3.3.2	accept	
	add upper reaches of privately owned land on northern side of Aro Street (specifically 146J, 146H, 142-144 and 132-140 Aro Street	136, 182	Officers have assessed the land and identified that it has landscape and ecological values but would be a low priority for acquisition for addition to Town Belt particularly given its current outer residential zoning and the protection afforded by the steepness of the sites. Recommend that other forms of protection such as covenants be investigated first during any proposed development.	reject	
8.3.2.2	Retain Boyd Wilson Strip in Town Belt	12,23,30,73,81,99,112,118,136,168,189,199,214,215	Retain the strip as Town Belt to ensure long term protection. Victoria University have no interest in acquiring the land	accept	

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	retain private land below Hadfield Gully	214	Officers have assessed the land and identified that it has landscape and ecological values but would be a low priority for acquisition for addition to Town Belt particularly given its current outer residential zoning and the protection afforded by the steepness of the sites. Recommend that other forms of protection such as covenants be investigated first during any proposed development.		
	add land in Aro Valley eg Te Aro School	12, 20, 23, 24, 30, 59, 73,74,104, 112, 118, 120, 132,136, 138, 149, 163,168, 175, 182, 189, 199, 213, 214, 215, 217	Agree with submitters – part of Te Aro School a priority for return to Town Belt subject to discussion and agreement with the Ministry of Education, Te Aro school and Port Nicholson Block Settlement Trust. Amend description of values in plan.	accept	
8.6.2	add Tawatawa Reserve to TB	15, 104, 129, 203	Tawatawa & Houghton Bay are not part of the horseshoe shape. They do not have a visual connection with the inner city suburbs or CBD. Neither are they part of the original Town Belt. Do not include Tawatawa Reserve and Houghton Valley reserve in Town Belt Management Plan.	reject	
	I am a bit disappointed that we cannot have the land south from Macalister park to Cook Strait and Mt Albert south considered for addition to the town belt.....so we have two tongues rather than, or as well as, the horseshoe shape. The horseshoe shape will allow bridges but the tongues would reflect that these are desirable additions to a living working town belt framework	203	see above		

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	There are some examples where WCC does not assess land correctly. E.g. two sections by Brooklyn Hill sub-station. These should not be removed from the Town Belt and should not be re-classified as road reserve as if substation gets included in Town B they would be lost	82			
	Brooklyn Hills □ 8.4.2 Corner of Nairn Street and Brooklyn Road , two small sections of land by the electricity sub-station. Council proposes to remove these from the Town Belt and re-classify them as road reserve on the basis that they are isolated from the Town Belt. We do not agree. These two small pieces of land are adjacent to Nairn Park and across the road from Central Park. They highlight an area that has been lost from the original Town Belt. If the electricity sub-station was ever available for reclassification as Town Belt, these two small pieces of land would sit alongside as Town Belt. We do not agree that there is benefit in reclassifying this land as road	103	The areas appear to be road reserve and are isolated from the rest of the Town Belt. The substation has a long established use on this land/		
	I do not agree with any land being removed from the Town Belt, in particular the three small areas off Brooklyn Road/Washington Avenue, Nairn Street and Connaught Terrace.	104	All three areas are isolated from the rest of the Town Belt and visually are seen as part of the roading corridor.		
	I think the conversion of land in Brooklyn to road reserve is a good idea. It would make clearer the legal status of the land for people like myself who use it to access our properties.	33		noted	
	8.4.2.1 I agree with the addition of all the lands mentioned on this point.	189		noted	
	8.4.2.2 I disagree with the removal of these areas from the town belt	189		noted	
8.7.2	ridgeline behind colleges - high priority	136		noted	

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<p>College lands. The main point that MOE would like to make in regard to this particular proposed addition is that, regardless of ownership and Town Belt status, both WC and WEGC want to be able to continue to use the area in to the future as they have been. WCC has identified that they use the land as a core part of their activities. Alexandra Park is used for school sporting activities and the track from</p>	132	Any discussions around transfer of land would take into account all of the current uses and values to ensure the future use by the school was not compromised.	noted	
<p>The MOE is interested in discussing the development/enhancement of tracks/routes through to Town Belt to improve and deliver safe pedestrian access to the Schools.</p>			noted	
<p>The MOE recognises that the proposed addition of School land is important for the overall cohesiveness of the Town Belt in regard to the vegetated slopes of Mt Victoria.</p>	132		noted	
<p>Wellington East Girls College is currently undertaking the development of a Master Plan for the School. The incorporation of school land into the Town Belt is a factor that needs to be incorporated and allowed for in this plan.</p>	132	The Council are more than happy to provide advice on Town Belt issues during the master plan development	noted	
<p>The topography of the WEGC site imposes a number of challenges, one of which is provision of parking. The MOE and WEGC would be interested in discussing options with WCC that might be able to address this issue. Another opportunity identified concerns the proposed widening of Ruahine Road by the New Zealand Transport Agency (NZTA) as part of the proposed second Mt Victoria Tunnel project – if land from the WEGC designation was added to the Town Belt this would compensate for the land removed from the Town Belt by the widening of Ruahine Street. WCC could insist that WEGC access is improved as part of this deal</p>	132	The Council is keen to meet and discuss all of the options around possible return of this land to Town belt.	noted	

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	<p>The back portion of Wellington College and Wellington East Girls' College land. Part of the Original Town belt. Owned by Crown and included in Deed of Settlement (RFR – for PNBST). I agree with the statement that this hillside and skyline is of high priority for addition to the Town Belt in the future.</p>	217		noted	
	<p>The plan says land may be taken from Wellington College and Wellington East girls college. I would not support this if it is land the colleges want to retain.</p>	78	Any transfer would need the agreement of both parties.	noted	
	<p>Alexandra Park – should remain in Wellington College ownership. This park is used extensively by the school. It is not fenced, and it can be used for public recreation when the school is not using it. When the park is in use there are pathways that can be used to walk around it.</p>	99	Any transfer would need the agreement of both parties.	noted	
	<p>Not in favour of WCC acquiring and returning Wgtn East and Wgtn College land if it means the people do not have full access. The land remains with the schools as long as the schools exist in their current locations</p>		Any transfer would need the agreement of both parties.	noted	
	<p>Embedded within this proposal however, is a suggestion to include a tiny piece of land (the road side strip between 45 and 49 Lookout Road) which currently is protected by Parks and Gardens. We strongly oppose this and request that it be EXCLUDED from Town Belt (p169 table 9) on the basis that: • This fee simple land is currently well managed and protected under Parks and Gardens • Town Belt acquisition intent is to include land concurrent to existing town belt. This piece is separated by Road, driveways and private land so does not enhance this criteria. Its total area is tiny, approximately 2 metres wide by 20 metres in length and serves as frontage to two private property boundaries.</p>	47	Do not add this section of land which includes the formed driveway into Town Belt as 2 houses have legal access onto this driveway and it has low values as Town Belt.		
	add Houghton Bay	15, 104	see above		
	CHAPTER NINE - Rules				

Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
3.1 and Ch9?	no mention of interpretation or possible use of species for Mana whenua purposes	203	SEE RESPONSE TO 3.1	-	APPENDIX 2
9.3 & 9.5	Add advice note: Archaeological Authority may be required from NZHPT for any earthworks associated with removing or installing new underground utilities within the Town Belt.eg PoW Park	72	agree with suggestion	Accept	add note about archaeological authority requirement
9.5.3	explain reasons for treating planting trees as a managed activity, and for limiting commemorative plantings to specific locations. emotional connection established with trees people have planted may result in more-enduring follow-up care.	95	should commemorative planting policy. Add commemorative	partly accept	add commemorative planting
9.6. 3	TB should not be privatised, commercialised or colonised for the financial benefit of any group or organisation current leases allowed finish but no transfer to other leaseholders. Public consulted on all proposals for major changes to infrastructure and/or staff,	32	want to encourage community - by providing opportunities for recreation groups to be based on TB... Major infrastructure is identified in Annual planning, resource consent, - all likely to involve public consultation at some stage ... New appendix 5 - process with public notification & Council committee approval	partly accept	strengthen wording around commercial activity permitted on TB. Develop process - clarify public consultation/Council committee approval
	utilities - TB contains facilities which might be used for developing/demonstrating 'ecotechnology' or efficient technology. Example destroyed at Zealandia by Capacity	171	-	noted	-
	Commercial - what if rugby union becomes insolvent? What happens to team/Rugby League Park facility?	209	leases are only given to incorporated societies. The lease will note responsibility for the buildings and facilities if a club	noted	
6.4.2 & 9	TAB facility, drunken parties - not what TB is for. Bowling club has legal opinion saying it can keep TAB facility - but removal condition of lease	241	check rules identify activities that are prohibited on TB	partly accept	add gaming machines - to prohibited list
Ch6.6 & DI 16.1 & 19.3 & 20.3	neither should Council have right to construct or authorise construction of buildings. Should contain words " no additional land be developed for organised recreational facilities (formal recreation) in the Town Belt "	134	SEE RESPONSE Ch 6 or DI	reject ?	-

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9.5.3	"Community gardens must always be available for public use and enjoyment, be not-for-profit, not fenced off from adjacent Wellington TB land and maintained by the community users in a "show-piece" condition"	215	ammend policy re not for profit, open to public fencing???'show piece' - no - many horticulture techniques includng permaculture - which can look messier than manicured garden beds provided by Council in high porfile locations around the city	partly accept	strengthen section 9.5.3 of Management Plan by stating that these are primarily for not-for-profit community use and not to be sold for commercial or private gain, and there will be no new private allotments
9.4.3	add phrase "not-for profit or non commercial use"	217	agree with suggestion	accept	strengthen section 9.5.3 of Management Plan by stating that these are primarily for not-for-profit community use and not to be sold for commercial or private gain, and there will be no new private allotments
9.4.4	"significant" " deems the effects to be of a nature" - gives too much discretion to Council officers.	209	decision-making guidelines, policies in management plan, District Plan/resource consent requirements - would identify if something was significant. ??	noted	make consistent with proposed legislation ??? Paragraph 19
9.4.4	all applications to construct/modify should be notified	209	they would be - via leases policy & possibly resource consent. DP review - opportunity to look at notification of consents on Open Space C land		make consistent with proposed legislation ??? Paragraph 19
9.6.3	too vague - prohibit commercial except Restrict or define to exclude this venture	209	review wording of 9.6.3.	accept	changed the wording and guidelines around the wording and changed its position to the managed acitivites section.
	provide planning framework guidelines/timeframes - landowner consent, Resource consent	111	see response Ch. 6	-	-
	need flexibility/adapt to change	111	see response Ch. 6	-	-
	meet needs & expectations of sport stakeholders	111	see response Ch. 6	-	-
6 & 9	suggest overall rules - balance, promote sport international facilities, no preference for sportsville, indoor, signage/sponsorship, extend footprint	111	see response ch 6	-	-
9.5.2	review current signage policy	111	content on sign - existing TB policy & Leases Policy (2012) - acknowledges that TB and other open space is a special space in the city and its purpose . To continue policies from 1995 plan - discourage commercial sponsorship encroaching on TB eg prominent billborards - research suggest residents like getting away from the urban environment . District Plan - size of signs etc on TB. Reivew of DP during next few years - opportunity to look at rules on signage	reject	-

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9.6.6	development outside existing footprint should not be prohibited - should be managed activity	111 & 216	see response Ch. 6	-	-
9.4	TB approvals additional to other legislation eg RMA (suggest words)	113	accept suggestion - review wording	Accept	change wording in 9.4 to say other approvals could be required eg RMA, NZTA, HPT, liquor license
9.4.3	add managed activity (NZTA) storage of materials "... areas, or construction lay-down areas for ..."	113	accept	accept	change
9.6.8	"horses", not an activity and this prohibition should be expanded to: "grazing, riding, leading or driving of horses". Similarly, the keeping of pets and livestock might usefully include goats and bees, and should address dogs specifically.	126	consider expanding list of prohibited activities. Look to keep bees where associated with activities such as community gardens and orchards.	accept	Add in the grazing of horses is prohibited and in the managed activities add in information on the Light Horse club.
	do not want restrictions & limitations new forms of activities - not considered recreational in traditional sense. Technological driven recreation	133	These would still be allowed under the current policies	noted	
9.5	prohibited activities - too broad. Many should be managed eg prohibition of vehicles (9.6.8) excludes bicycles, skateboards, roller skates	135	Council has a dual purpose tracks policy. That means mountain biking is allowed on all tracks - including those on TB, unless identified as due to things such as environmental damage or conflict with other users groups can not be rectified with better track design. (Open Space Access Plan)check if listed in allowed activities. If an activity is listed as allowed/managed eg mountain biking - it does not mean it is prohibited because 'vehicle'... is prohibited	reject	-
9.6	support right to grant easements & rights of way. 9.6.8e should be deleted	135	Easements and ROW's for private purposes are not allowed under the Deed or under the Reserves Act, The proposal for a limited licence for removal is the only option.	reject	
9.3.2	understand certain areas may need be closed to cyclists f, need direct reference to <TB as permitted activity alongside walking.	141	consider move mountain biking up list - could do informal activities first	accept	re-order - informal activities first
	Support trail building as managed activity	141	-	noted	-
	support limit on commercial activities	146	-	noted	-
	signage & sponsorship - good approach between protecting character of TB and offering opportunities for sponsors to facilitate volunteer activity	146	-	noted	-

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9.3	pleased MTB allowed activity & earthworks - with permission of Council	146	-	noted	-
9.6.8 *h)	support exclusion of trail bikes - change to " motorised trail bikes " or " motocross " bikes	146	clarify motorised vehicles	Accept	add motorised trail bikes to prohibited list
9.5.4	support - recognise & provides for existing & new utilities. Seek amendment to ensure operation, maintenance & upgrading of existing assets can occur without unnecessary restriction & to	153	add in new section	accept	New section added into 9.5.4
	vagrants living in TB. Ensure this is policed better. Feel unsafe walking through TB	15	homelessness strategy?	noted	-
9.3.2	community would support gathering pine cones - may b concerns about firewood gathering - safety & commercial point of view. Maybe under licence scheme. For community	203	Allowed for in 9.3.2 - check means no chainsaws. Licence? Not seen as necessary - but will monitor collection - may need to introduce	noted	add no chainsaws to firewood collection 9.3.2
	bear in mind CTS obligation	203	-	noted	-
	disturbed permissive nature of activities that are allowed. Particularly commercial activities - very open-ended. No "as of right: commercial activities of any kind should be allowed. All should be subject to public consultation	213	commercial activity - Public notification process will occur	noted	-
9.2	concern - freedom for WCC discretion in authorising activities	215	many activities will require Council committee approval	noted	-
9.2.2	managed activities should not generally be solely processed through landowner approval (LOA)	215	add note that other approvals may be required eg RMA, HPT, NZTA, Liquor license	accept	add note that other approvals may be required eg RMA, HPT, NZTA, Liquor license
9.4.3	reference to Leases Policy should be excluded	215	check if need to remove. clarifying role of leases policy in Ch 1 and in relevance to TB. This will make clear that TB policies must be used when assessing applications for lease. Add to Policy 6.6.3	partly accept	cross ref 6.6.3 to 9.4.3. update 6.6.3 - what is inconsistent between leases policy & TBMP
9.4.4	"public notification will be required in all cases where the proposed managed activities may have	215	Can include additional clause to note when activity could adversely impact on the Town Belt	accept	Add section to 9.4.4
9.4.4	exclude 9.4.4 a, b, c	215	identify all situations where public notification is required	reject	-
9.4.3	reference to camping may not be appropriate - Chest Hospital in particular	215	This enables short term camping for organised groups such as scouts, guides or other schools as a managed activity.	noted	
9.4.3	don't favour removal of natural materials being approved by LOA	215	This is an activity identified as a managed activity.	noted	
9.4.3	prospect of this policy allowing new buildings, extensions & alterations should be totally excluded. Also applies to structures, car parks & utilities. Aim for removal of all buildings & structures not absolutely needed	215	Policies encourage best use of existing facilities and restrict where new buildings can be constructed. There will be an ongoing need to redevelop facilities and this may include extension of existing or in some cases new facilities	reject	-

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9.6	too extensive & requires major editing. Listed activities should be brief & finite	215	This section has been amended and shortened	accept	
9.7	Final paragraph. "landowner approval will only be considered if the proposal can be authorised under the WTBMP	215	in section about District Plan - not relevant	reject	
SI & Ch. 9	Need clear set of guidelines required to allow groups to cater to changes - reduction, enhancement, extension of buildings & land under lease. Current guidelines far from clear, interpreted incorrectly	111 & 216	see response Ch. 6	-	-
SI & Ch. 9	Framework would provide transparent process & clear sets of guidelines about making applications and timeframes (land owner approval & Resource consent). (216 - This would ensure groups on TB do not incur expensive court costs like Badminton)	111 & 216	see response Ch. 6	-	-
9.5 i & j	whether could be undertaken at another location. Wellington hilly city & all flat land close to town is taken. Town Belt land obvious place to provide first class facilities.	216	-	noted	-
9.5.2	Disagree current policy on signs. Been prevented from obtaining sponsorship income - enable financial viability. Unless Council supplements income lost by recreational groups, a more flexible approach to signage is recommended	216	content on sign - existing TB policy & Leases Policy (2012) - acknowledges that TB and other open space is a special space in the city and its purpose . To continue policies from 1995 plan - discourage commercial sponsorship encroaching on TB eg prominent billboards - research	noted	-
9.5.2	sign continued	216	Council has no obligation to compensate groups for lost income	noted	-
9.9.5.1 (j)	important assess if activity could be undertaken elsewhere. Eg commercial/professional sports and activities	217	in Ch 6 - move this to main criteria to assess. Flowchart of process/key questions for assessor - will be developed	noted	-
9.5.4g	utility services underground - good	217	-	noted	-
9.6.4	non-recreational activity & development - prohibited - support strongly	217	-	noted	-
9.6.5	support - lease & licence prohibited eg childcare, schools	217	-	noted	-
9.5.3	do clauses a-g cover all vital points from Council guidelines 2009?	217	Yes they do but have made some changes to these to stress the need for the gardens to be not for profit and no allotments	accept	

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9.6.3	no long or short term commercial use except where it facilitates public recreation parks - too general. Limit to short-term special events, allowed under a current lease or related to essential utilities. Increasing commercialisation is a major worry	217	policies in management plan around commercial use	noted	clarify commercial activity has to complement primary recreation activity
9.6.6	concern footprint is whole park - allow very large buildings perhaps by professional sporting groups Not be appropriate & should be encouraged in other parts of the city. Does term footprint need to be clarified (also 6.6.2)	217	The footprint is only the area where proposals for development will be considered subject to the policies in each sector. There is a comprehensive checklist and process to go through before any land owner approval can be given.	partly accept	clarify footprint in 9.6.6 & Ch6
9.7	also need clause relating to TB being of 'historic social and cultural importance (DP 16.4???)	217	Add The Inner Town Belt is valued for its historic, social and cultural importance	accept	Add The Inner Town Belt is valued for its historic, social and cultural importance
9.6.6	disagree development should be prohibited outside existing footprint or lease area. Unnecessary	244	see ch 6 - footprint clarified to show that within Sport and Rec Parks it is the park footprint and	accept	
	doesn't mention MTB as an allowed activity here. Provides ambiguity	25	does mention. Consider reordering to have informal rec at top	reject	reorder activity
9.2.4 & 9.2.5	seek clarification - appropriate/inappropriate	32	The terms are used to describe the end point of a process to assess applications to see if they are deemed appropriate , and thus approved or inappropriate and then refused permission.	noted	
9.2.6 & 9.2.7	seek clarification - manage & maintain" discretion "balanced" "potentially conflicting"	32	check emails sent to submitter		
	no reference to HPA requirements it imposes for an archaeological authority before disturbing land occupied pre-1900	32	Policy in 7. ???? Add bit around earthworks may require Archaeological authority in ch 9	accept	add archaeological authority requirement
	most concerned greater flexibility for Council things around organised sport & leasing buildings or land & commercial activities & events. Token criteria in plan - No real influence p... potential rates or	36	changed wording in the plan in chapter 6 and Chapter 9	accept	add section to 9.5 and 6.7
	We do not want a repeat of waterfront - business & commercial use. Wording what Council is able to do needs to be much ore controlled to ensure we	36	policies in management plan around commercial use	noted	clarify commercial activity has to complement primary recreation activity
	concerned criteria mention in plan eg 4.3 as things that just need to be taken into account. Not determinants or requirements. Leaves them wide open to have no real influence eg views of area,	36	Yes they are to be taken into account so will have an influence. In some cases they will be determinants. For instance when areas are identified to be retained for outdoor recreation.	noted	
9.3	suggest change allowed activity earthworks for tracks - note Archaeological authority may be required from Historic Places Trust for track building. Systematic	72	agree with suggestion	Accept	add note about archaeological authority requirement

9	concerned about visual encroachment of buildings. Design of buildings & visual impact should be considered by Council as part of review of DP	72	see Ch 7	noted	-
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	Number of heritage trees, some planted by notable people to mark important events & anniversaries. Full inventory should be undertaken & appropriate level of protection given to these trees within TBMP	72	see Ch 7	noted	-
9.4	commercial activities confined to short-term licences associated with special events. Exclusion of commercial activity seen as being fundamental in protecting its unique character & status	77	commercial	reject	clarify commercial activity has to complement primary recreation activity
	all leases, licences, easements subject to public notification, consultation, public hearings. Key to public having trust & confidence in management. Omnibus notifications & hearings each quarter would confine the time & expense of maintaining such an open & transparent regime	77	public consultation From Leases Policy 2012 " <i>In the interests of transparency, all proposed leases of reserve and non-reserve land will be publicly notified in accordance with the process set out in sections 119 and 120 of the Reserves Act. Land that is managed as reserve but is not classified as such will also be publicly notified. Although the public notification process will not be undertaken in accordance with the Reserves Act, the Council will follow the process outlined in the Reserves Act." page 4</i>	partly accept	change 9.4.4 to include more instances of public notification
9.5.1j & 6.5.4	information required: suggest evidence from applicant of having explored all possibilities of findings a location outside the TB	77	in Ch 6 - move this to one of main criteria to assess. Flowchart of process/key questions for assessor - will be developed	Accept	-
9.5.1c	reference to park visitors could be removed. Vs residents. Any tendency to having facilities catering to visitors could undermine the natural & informal character of TB	77	The term community in 6.6.1 is intended to cover both residents and visitors. Tourists may need activities and facilities but which of those will go on Town Belt will be limited by the Management Plan and the Deed. Any activity should be necessary to enable public use and enjoyment of the Town Belt.	reject	-
9.5.1 j	strongly support	77	-	noted	-
9.6.3	strongly advocate all long-term commercial use be explicitly prohibited. Short-term commercial use, except exceptional circumstances when this associated with special event	77	see above =9.4	-	-

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	leases should be meaningful length to enable functional tenancy ie 2yrs too short	79	are any leases granted that are less than 2 years? Lease policy issue	noted	-
9.6	exclude motorised vehicles eg car rallies. Kite flying should be excluded (airport flight path - sector 7,8,9)	63	vehicle access for private purposes is prohibited.	noted	
DI & 9	lack of clarity in what is proposed. Lack of detailed policy guidance	160	see response DI	-	-
	camping banned - support. Should read "except in areas designated by council".	218	consolidated bylaw	accept	except in areas designated by council bylaw
	do not want commercial activity but acknowledge sporting groups which undertake activities generate funds to keep their recreation groups viable	103	-	noted	clarify commercial activity has to complement primary recreation activity
9.6.3	concern prohibit commercial activity except where facilitates public recreational use" too vague. Permits exploitation of clubs by commercial entities. Restrict or more clearly defined to exclude this type of venture	109	commercial - check wording leases policy p11	accept	clarify commercial activity has to complement primary recreation activity
	TB supports non-profit leisure & community activities & do not support commercial activities	177	see above	noted	clarify commercial activity has to complement primary recreation activity
	protect from invasion by residential & business	94	-	noted	-
	looking at catering options to generate proceeds for hockey. Want to provide community space with some proceeds coming back into hockey	196	commercial?		clarify commercial activity has to complement primary recreation activity
9 & 6.4.1	WRFU after longer lease - facility a liability for banks. Commercial activity should be allowed anywhere	241	commercial	noted	clarify commercial activity has to complement primary recreation activity
	protection of TB more important. Recompense for damage by commercial activities seems odd. Should have no damage in first policy. Concessions policy may be needed but it might not work	241	-	noted	-
	commercial aspect a lot more prominent. Brings in money aspect	217	-	noted	-
19.2	authorises profit commercial. Clubs close off space for events - limits access. Any activity must be related to recreation	242	clarify commercial activity has to complement primary recreation activity	partly accept	clarify commercial activity has to complement primary recreation activity
	Farmers markets? Commercial activity. Once start making concessions like this it causes trouble. Time moves on but can't forget purpose of TB	242	Need to assess as prt of commercial application	noted	

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	Mt Victoria has lots of tourists. Commercial partnerships may be needed to help wider group use TB eg treetop & gondola	43	look at 9.6.3 - facilitates public recreational use	noted	-
6.4.1 & 9.4.3?	concerns about elite sport. Define better. Remove connotation about commercialisation of sport. TB for all. Not just those obtaining financial benefit from land/facilities	215	commercial		clarify commercial activity has to complement primary recreation activity
	what happens if WRFU goes belly up, taken over by commercial entity	215 & 209	Community leases are only given to incorporated societies. The lease will note responsibility for the buildings and facilities if a club becomes insolvency.	noted	
	no commercial activity. Many child-care facilities & sporting facilities are quasi-commercial. Recognise clubs need to raise funds (bars/cafes) on understanding any surplus goes to club. Clubs should not have right to allow commercial operators to come in	77	Add in new section about commercial activity	reject	-
	tour buses - don't think council has a right to use as revenue source	77	-	noted	-
	ok with zoo, spca, squash if \$ goes back into entity. Sporting bodies have exclusive use for training. Becomes an asset in their portfolio. Concern sports teams are tradable	77	Community leases are only given to incorporated societies. The lease will note responsibility for the buildings and facilities if a club becomes insolvency.	noted	
SI & ch9	difficult to predict development needed in future eg popularity of sevens, Impact how people want to participate in sport. Want ability to change & meet demand. Request change to wording around expanding existing footprint	75	see response Ch. 6	-	-
SI & ch9	Some facilities will be on TB. Want ability to change. If demonstrated need we don't want unnecessary onerous. Do not want policy to be Council won't consider any proposal to build on TB	75	see response Ch. 6	-	-
	rationisation of buildings encouraged	242	-	noted	-
	council should not have legal right to grant easements over TB/	209	The legislative change will enable the Council to grant easements	noted	

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	any decisions made by previous councils, in contravention of Deed will henceforth be considered legal. Council commissions & releases an independent report into any decisions that would be legalised by this provision	96	This relates to the drafting instructions. It would be a huge undertaking to assess every utility on Town Belt land and every agreement. The likelihood and risk of any deemed unlawful is veyrylow. It is deemed that all public utilities currently on town Belt will be lawfull under the bill. Any new utilities or applications would need to confirm to the provisions in the bill.	noted	
	support Council position on preventing new encroachment - but want some clarity about existing minor encroachments (also see 8.4)	208	see response Ch 8	-	-
	support councils proposed approach to encroachments	109	-	noted	-
	oppose encroachment on TB	20	-	noted	-
8.7.... & Ch9	encroachment - bans permits for new tenants & owners (Carmichael). Similar eg Bell Rd & Upper Wadestown. Needs to be made clear - Private access to homes.	150	Officers recommend no change to the policy on encroachments as a prohibited activity. The apporval of limited term licences to manage the process of removal is covered under the policies in the plan.	noted	
9.4.3	plan does not deal with permanent public vehicle access - should it be added to managed activities?	113	assume mean cars can park in car parks	Accept	clafify that people can park in car parks for public purposes - allowed activity
9.5	decision making guidelines " <i>in respect of car parks, temporary access & permanent public access, where the activities may impact on the SH, whether the NZTA has approved the proposed car park(s), temporary access or permanent public access</i> "	113	if accept addition of permanent public vehicle access - add to allowed activity?- accept suggestion - may review wording	partly accept	add permanent public vehicle access to carparks to allowed activity list. change wording in 9.5 to say other approvals could be required eg RMA, NZTA, HPT, liquor license
9.6 & 9.4.3	"learning institutions" prohibited. Courses are recreation "re-create" start something new. Suggest outdoor learning activities should be part of managed activities	147	envi educ. Clarify what is acceptable & what is not re education on TB. Not-for-profit/to cover costs. Ban commercial or formal edcuation providers	reject	prohibit formal education/qualifications
9.3	allowed activities - specification on 'non-commercial purposes' is essential	76	-	noted	-
9.6.5	prohibited activities - clarification at last	76	-	noted	-
	alcohol - some sports it seems to be main focus. It should be incidental to main activity	240		noted	
	massive investment in community & we need certainty of availability of this facility. Request longer term lease if fit certain criteria	75	also check DI	-	-

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	motorised recreation (motorbikes) not listed as prohibited activity - damage vegetation	186	agree with suggestion	Accept	add motorbikes to prohibited list
	current license for 3 yrs. Have limited volunteer time to work on applications etc. Anything that makes process easier, less frequent would be good	180	see response Ch 6	-	-
	If organisation winds down, they need to carry out responsibility of lease. Would require formal closure & return to council	180	see response Ch 6	-	-
	Legally required to go through RMA process before getting landowner consent	216	develop flow chart with process to assist groups	noted	-
	hockey expensive sport (specialist surfaces) need to generate non-hockey revenue	196	see response Ch 6	-	-
	Mt Vic bowling club TAB facility, drunken parties. Not what TB is for. Officers told us TAB propped up club during process to renew lease	241	add gaming machine as prohibited activity. Does not help people appreciate open space, conservation & recreational qualities of TB (policy 9.6.3)	partly accept	add gaming machine as prohibited activity.
	want continued access to TB for horses	39	see response Ch 6	-	-
	concern pokie & TAB machines on TB	242	add gaming machine as prohibited activity. Does not help people appreciate open space, conservation & recreational qualities of TB (policy 9.6.3)	partly accept	add gaming machine as prohibited activity.
	more specificity needed/ Activities hidden.	161		noted	
	Existing encroachment issues - Council needs to do more on this	161	-	noted	-
	decisions about TB should be made having full regard to Deed-partnership between Councillors &	215	public consultation process identified in Rules chapter	noted	
9 & Ch6	challenge for future - will not be able to support all requested uses and activities	215	-	noted	-
6.4.4 & 9.5.3	limited amount of suitable areas - don't take out native bush for gardens	170	see response Ch 6	noted	-
6.4.4 & 9.5.3 & 9.6 ??	support community gardens & orchards - but not individual plots. Source of pride. Gardening is a recreation activity & effective way of contributing to community health & development	103	see response Ch 6	partly accept	specify no individual plots
6.4.4 & 9.5.3 & 9.6 ??	CG encourage community access & use of TB for recreation, promote conservation values. Education contributes to conservation, sustainability & recreation	108 & 143 & 147 & 162 & 194 & 57 & 71 & 85	see response Ch 6	partly accept	prohibit formal education/qualifications

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6.4.4 & 9.5.3 & 9.6 ??	more envi education, CG & food growing activities - horticulture, how to grow workshops	170	see response Ch 6	partly accept	prohibit formal education/qualifications
6.4.4 & 9.5.3 & 9.6 ??	want to see environmental education included	170	see response Ch 6	partly accept	prohibit formal education/qualifications
6.4.4 & 9.5.3 & 9.6 ??	more environmental education & allowance made for certified environmental education eg horticulture classes to be run	173 & 85	see response Ch 6	partly accept	prohibit formal education/qualifications
6.4.4 & 9.5.3 & 9.6 ??	support CG on fringes of TB but do not support "individual plots"	230	see response Ch 6	partly accept	specify no individual plots
6.4.4 & 9.5.3 & 9.6 ??	TB has role in environmental education & urban agriculture - support policy that enables this mandate	79	see response Ch 6	partly accept	prohibit formal education/qualifications
6.4.4 & 9.5.3 & 9.6 ??	Environmental education, horticulture education, community run education eg permaculture, natural foods, natural education. Eg Education Outside the Classroom (EOTC) programmes run by schools & workshops by Innermost Gardens.	83	see response Ch 6	partly accept	prohibit formal education/qualifications
6.4.4 & 9.5.3 & 9.6 ??	horticulture activity not for commercial gain	170	see response Ch 6	accept	specify not for profit
6.4.4 & 9.5.3 & 9.6 ??	Education way of raising awareness - want it to be an acceptable activity. Use TB as a classroom. Envi education recreation activity. Helps schools * & organisations be more active on TB	162	see response Ch 6	partly accept	prohibit formal education/qualifications
6.4.4 & 9.5.3 & 9.6 ??	CG outdoor pursuit. Good way to involve new immigrant groups. Oppose movement towards individual allotments, sell for profit or holding course with formal qualifications	217	see response Ch 6	accept	specify not for profit, no individual plot, no formal qualifications
6.4.4 & 9.5.3 & 9.6 ??	restrictive activities include CG with keep out sign. Groups have advertised as selling produce	161	see response Ch 6	partly accept	specify not for profit.
6.5.7 & 6.6.21 ?	TB as a cultural artefact is important. Recognised in plan. Is there a role for Wellington Sculpture Trust?	177	obj 6.5.7 - add art/culture space. broaden 6.6. art on TB. Historic fountains. Check botanic garden plan policies pg 28. Check public art policy and Ch 9 activities	partly accept	add to 6.5.7 & new policy

6.4.2	excessive noise for neighbours (Mt Vic bowls) bowls don't need sound equipment. Object to ideas, schemes, plans to violate original	253	This should be covered by conditions of the lease with the club. Any lease conditions should be consistent with the	noted	APPENDIX 2
APPENDICES					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
2.5 & Ap 4	question Council mandate to abandon grievance with Crown. If 2.5 dropped from plan, capture in App 4	84	SEE RESPONSE 2.5		
7 & 2.2.4	want recognition of effort of William Tonks to protect TB	249	note Tonks efforts in Appendix. Put general comment about public efforts to protect in 2.2.4	Accept	add sentence about Tonks
1.2 & Ch7 & Appendix 3 & 4	focus on future not Maori revisionist history. Creates unease and contention not relevant to plan	250	SEE RESPONSE IN CHAPTER 1		
1.2 & Ch7 & Appendix 3 & 4	history should be factually correct and uncontroversial	250	SEE RESPONSE IN CHAPTER 1		
7.1, 7.2, Ap3, Ap4	Sec 7.1, 7.2, Appendix 3 and 4 need more research and writing. Best achieved as separate documents	250	SEE RESPONSE IN CH 7		
Ap3 and Ap4	combine Appendices 3 and 4 - more concise	250			
DRAFTING INSTRUCTIONS					
Policy/ ref	Change suggested	Submission #	Staff comments	Accept or reject	Changes required to plan
	question charitable trust. Should be "the Trust"	215	Amend drafting instructions. Legal advice is that the Deed does give rise to a charitable trust, but this does not need to be included in local Act. Amend drafting instructions:	accept	11.1 Council holds the Legal Town Belt as trustee; 11.2 The trust is a charitable trust; and 11.32 The charitable purpose of the trust is ...

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<p>The Council and officers are being given wide powers that override the existing protections provided by the Deed.</p>			<p>While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency.</p>	<p>reject</p>	<p>change section 12 to <i>The Bill will be a code for how the Legal Town Belt is governed.</i> <i>Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i></p>
<p>I support the part of the Bill which states that "it is intended that the Council will have no power to voluntarily oppose sell, exchange or use as security any part of the Town Belt" (pg 18) draft Town Management Plan</p>	<p>100</p>			<p>noted</p>	
<p>We support the Council's legislative guidelines, designed to simplify management of the Town Belt, and to protect the Town Belt from development into the future</p>	<p>103</p>			<p>noted</p>	
<p>Modernising and simplifying the legislation for the town belt, along with a guiding set of principles will lead to improved governance and management.</p>	<p>107</p>			<p>noted</p>	
<p>We support legislation to legally add land already managed under the Town Belt Management Plan, and future possible additions, to the Town Belt thus bringing it under the provisions of the Deed.</p>	<p>109</p>			<p>noted</p>	
<p>I oppose the abolishing of restrictions on the Council pursuant to the 1873 Deed and allowing the proposed Town Belt Bill to prevail over the Deed "in the event of inconsistencies". The Deed should prevail over any legislation in the event of inconsistencies and remain the governing document of the Town Belt.</p>	<p>88,191</p>			<p>noted</p>	

I believe that the 1873 Deed should remain the governing document of the Town Belt.	110	While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency.	reject	change section 12 to <i>The Bill will be a code for how the Legal Town Belt is governed.</i> APPENDIX 2 <i>Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i>
We support the intention to draft a bill, enshrining the Trust Deed of 1873 providing for the comprehensive protection of the existing Town Belt.	120		noted	
all the areas that WCC proposes to add to the Town Belt • the Botanic Garden, with a provision for the garden to have its own management plan.	120	At the moment the Botanic Garden is vested in Council pursuant to the Wellington Botanic Garden Vesting Act (WBGVA) 1891 and is managed separately from the Town Belt. The Botanic Garden is not part of the trust that was settled by the Deed in 1873.	reject	We recommend that the drafting instructions be amended to provide a mechanism whereby any land no longer required for the Botanic Garden would become Legal Town Belt. The Botanic Garden will continue to be subject to the WBGVA.
I strongly oppose the objectives and intent of the proposed legislative change.	126	The modern approach is to limit the purpose for which powers may be exercised and the process that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10).The "relatively flexible powers" under the proposed drafting instructions are "full capacity for the purpose of performing [Council's] role as a trustee of the Legal Town Belt". These will be subject to:1.1 The normal decision making provisions of the Local Government Act 2002. Compliance with the Management Plan; and 1.2 Having regard to and seeking to apply the statutory principles	noted	

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It is legally absurd to propose to add land to the Trust Deed that was not included within that Deed in 1873 and diminishes the historic value of the original Deed	126	The issue is not 'legal' in the sense that there is nothing stopping the local bill from doing what is proposed and nor are there any deeper constitutional reasons or legal conventions which stand in the way. .	reject	
Instruction that the Botanic Garden area while provided from part of the Original Town Belt areas is unaffected as it is subject to its own Act. It would be of real value if this Bill could actually acknowledge the Botanic Garden as legally part of the Wellington Town Belt while still having its own Act and Management Plan. It is part of the semi- circle of green.	217	At the moment the Botanic Garden is vested in Council pursuant to the Wellington Botanic Garden Vesting Act (WBGVA) 1891 and is managed separately from the Town Belt. The Botanic Garden is not part of the trust that was settled by the Deed in 1873. if the garden was to be included it would have to be part of the special schedule given its wider role than just recreation. It has major conservation and educational roles.	reject	We recommend that the drafting instructions be amended to provide a mechanism whereby any land no longer required for the Botanic Garden would become Legal Town Belt. The Botanic Garden will continue to be subject to the WBGVA.
We should like to see the Botanic Gardens included in the legislation as a fundamental part of the Legal Town Belt. This would not need to affect the way it is managed.	84	see above		
This instruction needs further consideration. The legislation for the Botanic Gardens was passed in 1891. Is it still fit for purpose? If not, which would be the better option – updating the present Act or repealing the Act and incorporating the Botanic Garden as a special area in the Town Belt?	96	see above		

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<p>To say of the Trust Deed that it is almost 140 years old and its “age, archaic language and nature ... means it is too general to provide clear guidance and consistency for the management decisions” that are now needed is both ignorant and misguided. The language would be no more archaic than that in the documents that incorporated the Council and gave it title to significant areas of land within the inner city and waterfront. As for age, the document is 33 years younger than a document many wish to adopt as an element of our constitution and in many cases centuries younger than statutes still relied on, such as the meaning of charitable purpose in the preamble to the Charitable Uses Act 1601.</p>	126	<p>Council has experience of protracted and expensive debates over what the 1873 Deed does and does not permit - for example the crèche and the badminton hall. That is the reality Council faces. There are however practical differences between say the Treaty of Waitangi and the 1873 Deed. The Treaty has been much litigated (and continues to be). Given what is at stake in Treaty debates, seeking the Court’s guidance is sensible and comparatively affordable. By contrast, it is wasteful for Council to manage land in the heart of Wellington under a legally uncertain regime that causes controversy and for which litigation could be regarded as out of proportion to the interests at stake.</p>	reject	
<p>Relationship of the Botanic Garden and the Wellington Town Belt. The land occupied by the Botanic Garden is all part of the Original Town Belt. While it has its own Act and Management Plan can it not also be acknowledged legally in some way in this Bill as part of the ‘Wellington Town Belt’ – perhaps at least in a schedule. It provides a considerable area within the green semi circle of the legal Town Belt. It also makes no sense to say some areas are isolated from the Town Belt when in fact they are close to the Botanic Garden.</p>	126	<p>Section 5.2 of the drafting instructions will summarise the history and concept of the Town Belt and can recognise the Botanic Garden and its relationship with the original Town Belt.</p>	noted	
<p>The Trust Deed should not be looked to for guidance in management decisions, beyond the very broad powers it conveyed to the Council. Clearer guidance is provided by statute in the Wellington (City) Town Belt Reserves Act 1908 (particularly with regard to leases), the Trustee Act 1956 and the Reserves Act 1977, which requires a management plan for all reserves.</p>	126	<p>Clearer guidance is not provided by statute in the Wellington (City) Town Belt Reserves Act 1908. The legal effect of that legislation is uncertain and untested. Nothing is stopping Council from continuing with the status quo - i.e. managing the Town Belt in accordance with the 1873 Deed together with the overlay of subsequent legislation such as the Reserves Act 1977.</p>	noted	
<p>MOE supports the overall objectives of the proposed legislative change.</p>	132		noted	

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	<p>I get the impression that WCC officers have no concept of the historical importance of the Town Belt Trust Deed of Settlement 1873 and its value to the people of Wellington</p>	134		noted	
	<p>WCC only has powers to manage the land for the citizens of Wellington - it does not have beneficial ownership of the land. However it appears WCC believes it can do what it wants regardless of the Trust Deed. It is vital that no additional powers should be given to officers beyond those existing under the Trust Deed.</p>		<p>While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency.</p>	noted	
	<p>We oppose the abolishing of restrictions on the council pursuant to the 1873 Deed and allowing the proposed Town Belt Bill to prevail over the Deed "in the event of inconsistencies". The Deed should prevail over any legislation in the event of inconsistencies and remain the governing document of the Town Belt</p>	209	<p>see above</p>	noted	
	<p>The 1873 Deed should remain the governing document of the Town Belt and not be tampered with, such as granting WCC "flexible powers" over TB land.</p>		<p>The modern approach is to limit the purpose for which powers may be exercised and the process that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10).The "relatively flexible powers" under the proposed drafting instructions are "full capacity for the purpose of performing [Council's] role as a trustee of the Legal Town Belt". These will be subject to:1.1 The normal decision making provisions of the Local Government Act 2002. Compliance with the Management Plan; and 1.2 Having regard to and seeking to apply the statutory principles</p>	reject	

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<p>I oppose the proposal to change the Town Belt's legal framework. I do not see how the proposal strengthens the protection of the Town Belt when it gives the Council broad flexible powers to do whatever it wishes. The Deed already gives Councillors, as trustees the legal authority to hold and manage the Town Belt, and that must be done in accordance with the provisions of the Deed. Those provisions are not "...too general to provide clear guidance..." but rather are very clear (as noted above). In addition, the principles are such a broad bunch of conflicting statements that they provide even less clear guidance than the Deed itself.</p>	142	<p>The modern approach is to limit the <u>purpose</u> for which powers may be exercised and the <u>process</u> that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10).The "relatively flexible powers" under the proposed drafting instructions are "full capacity for the purpose of performing [Council's] role as a trustee of the Legal Town Belt". These will be subject to:1.1 The normal decision making provisions of the Local Government Act 2002. Compliance with the Management Plan; and 1.2 Having regard to and seeking to apply the statutory principles</p>	reject	
<p>I am totally opposed to having any provision in the legislation that would allow so much as a square millimeter of any original Town Belt land to be sold.</p>	174	<p>The bill will provide for boundary adjustments at the time of enactment. These have already been identified in the management plan and are mainly to ensure the legal Town Belt matches the facts on the ground. There will be no mechanism for further removal of land in the bill. This will require further legislative change.</p>		
<p>I support the draft Town Belt Management Plan and the proposed legislative changes to strengthen its governance.</p>	184		noted	
<p>I do not support the Council being given more powers over the Town Belt.</p>	191	<p>The bill does not necessarily give the Council "more" powers but clarifies its existing powers</p>	noted	
<p>I support the current legal status of the Town Belt , as stated in the 1873 Deed and I oppose any changes including any powers by Wellington City Council over the 1873 Deed, and that the Town Belt remain "in trust forever after" as a "public recreation ground" with no further buildings or encroachments permitted.</p>	90		noted	

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<p>WECA is opposed to the removal of the Reserves Act coverage from the Town Belt and consider the drafting legislation to be inadequate to protect the original reasons that the Town Belt was set aside under the 1873 Deed in trust for the residents of Wellington.</p>	197	<p>Relevant parts of the Reserves Act are going to be included in the local bill. In place of sections 17 and 40 of the Reserves Act, the local Act will require Council to have regard to and seek to apply the statutory principles. It is expected that the statutory principles will cover much of the same ground as section 17 ("Recreation Reserves"), including freedom of entry and access. In place of the right of objection (s120 Reserves Act), the local bill will identify when public notification will occur eg for the granting of leases/licences, construction of building etc. However the final decision will be with trustees rather than the Minister. There will be no or very little change to the current powers of the administering body because most decisions regarding Recreation Reserve are delegated back to Council (s42-52 Reserves Act). The local bill will have stronger safeguards for granting easements than the Reserves Act (s48).</p>	reject	
<p>We consider the proposed legislative changes to be contrary to the spirit and objectives of the original deed, and wish the 1873 legislation to remain inviolate, and preserving the heritage value.</p>	202		noted	
<p>33. We do not have a strong view either way about the need for new enabling legislation. We note however that many rules and guidelines in the proposed plan still refer to the Reserves Act 1977 in a number of places (eg throughout criteria and guidelines in sections 9.4.4 and 9.5) and therefore if new legislation is sought the relationship of such legislation to the Reserves Act or its amendments or successors would still need to be clarified.</p>	204	<p>In enactment of the legislation the management plan will become the operative plan. However it is likely that the plan would be amended to ensure it was consistent with the new legislation . In particular with reference to the Reserves Act.</p>	noted	
<p>Drafting instructions for proposed Town Belt legislation Action for Environment (A for E) has long advocated for the return of former Town Belt land to Town Belt status, so we very much welcome and support legislation to do that</p>	209		noted	

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<p>What A for E has long hoped for, a simple bill to restore land taken from the Town Belt land, has morphed into something else entirely and it is of great concern to us. If the legislation follows these drafting instructions it would make the most radical changes to the control and status of the Town Belt since it was gifted to the people of Wellington. It is akin to attempting to change a will 139 years after it has been executed.</p>	209	<p>The primary purposes of the bill are to resolve the existing legal complexities: improve and modernise the governance arrangements for the Town Belt and, in conjunction with the Town Belt Management Plan, provide the public with a single and easily understood reference point for how the Town Belt will be protected and managed in the future.</p>	noted	
<p>The drafting instructions however appear very much to us as a move by the council to downgrade the Deed and to take beneficial ownership of the land. It's a takeover of the commons</p>	209	<p>The Council will continue to hold the Town Belt in trust in accordance with the Town Belt Deed.</p>	reject	
<p>A for E very much opposes giving the Council "flexible powers" over the Town Belt.</p>	209, 213		noted	
<p>The draft Town Belt Management Plan Action for Environment very much agrees with the statement that the 1873 Deed "remains the most important document for the Town Belt today", however we don't think the drafting instructions for the proposed legislation follow it.</p>	209	<p>While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency.</p>	noted	<p>change section 12 of the drafting instructions to. <i>The Bill will be a code for how the Legal Town Belt is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i></p>
<p>I am keen to make sure that all provisions in legislative changes ensure that notification and consultation prior to any construction being carried out in the Town Belt, are strong enough to enhance our democratic process with regards to the Town</p>	20		noted	
<p>We support the overall objectives of the proposed legislative change, so long as they act to protect those original pockets of Town Belt still available for re-inclusion and promote its green inner city spaces as "the lungs of the city", as argued above</p>	214		noted	
<p>The Friends strongly agree to preparation of instructions for a new Wellington Town Belt Act. This action should proceed immediately as the top priority.</p>	215		noted	

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	The Friends advocate the need for the Bill to come first to ensure “a single and easily understood reference point” is available.	215	Officers recommend no change. The Council made a decision at the start of the project to manage it this way and for the management plan to be an interim plan at the time of legislative change. Consultation has been completed on the plan. There is no advantage in stopping the project at this late stage.	reject	
	The Friends believe caution should be exercised before any of the mentioned legislation is repealed. An independent check is first required that none of the statutory provisions in question will/may never be required.	215	Agree that this will be carried out as part of the drafting process.	accept	
	Pleased to see reference to Original Town Belt. Consider adding a definition for “reserve land managed as Town Belt”.	96	The term legal Town Belt refers to both land that is part of the 1873 Deed as well as any other land to become added to the Legal Town Belt.	reject	
	The intended legislation must not only ensure it is consistent with but also adheres to the purposes specified in the instructions of 1839 and the Wellington Town Belt Deed.	215	The primary purposes of the bill are to resolve the existing legal complexities: improve and modernise the governance arrangements for the Town Belt under the 1873 Deed. The bill will acknowledge the original Town Belt but will not adhere to the instruction that no buildings be ever erected upon it.	noted	
	The Friends believe caution is needed if the “relatively flexible powers” referred to are indeed translated into the new Wellington Town Belt Act and associated/subsequent management plan.	215	The modern approach is to limit the purpose for which powers may be exercised and the process that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10). Can change the wording to emphasise "power" in general.	accept	Provide Council with relatively flexible powers to manage the Legal Town Belt, provided that it does so in a way that is consistent with both the charitable purpose of the 1873 deed, and the management plan in force at the time, and the principles in paragraph 14 below.
	The Friends request that the Council provide a more extensive explanation of what is meant by “the charitable purpose of the Trust Deed.”	215	Legal advice is that the Deed does give rise to a charitable trust, but this does not need to be included in local Act	accept	Council holds the Legal Town Belt as trustee. The trust is a charitable trust; and The charitable purpose of the trust is ...
	In defining the land, there should be reference to all land currently able to be formally identified as Wellington Town Belt including the Wellington Botanic Garden, the Zoo and Chest Hospital.	215	The Zoo and the Chest Hospital will be identified in the bill. The Botanic Garden will referenced as an area that will become legal Town Belt if no longer used as a Botanic Garden.	noted	

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	The Friends agree that defining the land provision should include the removal proposal.	215		noted	
	As the Friends believe advancing the proposed Wellington Town Belt Act is the first priority the legislation should accept and provide for already identified areas not immediately able to be added due to resolution of survey or other technical issues to be added as promptly as possible. The point here is that large areas of land were identified at the time the existing 1995 management plan was approved which has yet to be formally added.	215		noted	
	The Friends are very impressed with the proposed preamble for the legislation.	215		noted	
	The question of land covered by the legislation (clause 7) and intended further additions (clause 10) may not immediately be able to be formally protected due to delays with survey or other technical issues. There may be a need for special provisions to cover this to avoid the delays such as have occurred with formalising additions since the 1995 management plan was finalised	215		noted	
	The Friends request that the provisions in the Wellington Botanic Garden Vesting Act 1891 be incorporated in the new Act/Bill	215	At the moment the Botanic Garden is vested in Council pursuant to the Wellington Botanic Garden Vesting Act (WBGVA) 1891 and is managed separately from the Town Belt. The Botanic Garden is not part of the trust that was settled by the Deed in 1873.	partly accept	We recommend that the drafting instructions be amended to provide a mechanism whereby any land no longer required for the Botanic Garden would become Legal Town Belt. The Botanic Garden will continue to be subject to the WBGVA.
	The proposals in clauses 25 and 26 may need to be reconsidered if a longer term future review (the Friends suggest 15 years) and the existing 1995 management plan may be agreed to be rolled over until new procedures under the new Act has been enacted.	215	A 10 year review is prudent even if it a relatively minor review. The existing plan will roll over but may require a minor review on enactment of the bill. .	noted	
	Please add the words which referred to "no buildings on the Town Belt".	96	The Town Belt will continue to be governed under the 1873 Town Belt deed. This does not prohibit buildings and structures on Town Belt.	reject	

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The 1839 instructions of the New Zealand Company to the Surveyor-general Captain Mein-Smith, regarding the Town Belt should include the instruction: "that no buildings be ever erected upon it"	88		noted	
I suggest the word 'Wellington' be added before Town Belt in both legislation and management documents – at least in the title and major headings. It is excellent that instructions for the preparation of the Bill and the Preamble and Definitions of the Land refer to the Original Town Belt instructions of 1839; The Plan of 1840; and the proclamation of 1841 as well as the Deed of 1873.	216		accept	
It is also excellent that the legislation will provide the means of adding some 85 hectares of Council land waiting for Town Belt status and that these areas are either returned from lands originally in the Town Belt or adjacent and appropriate new areas.	216		noted	
It is important that this Bill provides the mechanism to add appropriate new land in the future.	216	The bill will enable additional land to be added to Town Belt in future.	noted	
It is also vital that no future land will be removed without an Act of Parliament.	216	Following enactment, rationalisation of land will occur. No additional land can be taken out without an Act of Parliament.		
I am very pleased the Bill will clearly confirm that the Wellington Town Belt will continue to be held by the Council in trust for the people of Wellington.	216		noted	
While the powers of Council are generally similar to those held under the present Management Plan I do have concern that some sections need to be tightened with regard to areas such as leasing, construction and commercialisation on the Town Belt.	216		noted	
I am pleased the Preamble also acknowledges the significance of the Original Town Belt and the history relating to the instructions and history from 1839-1873.	216		noted	

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This clarifies that the Chest Hospital 'special areas' is only the building footprint and immediate grounds become a special area	216	Only the legal parcel around and including the buildings will be a special area.	noted	
The Bill will include a mechanism to add new land in the future. The Bill will not allow removal without a subsequent Act of Parliament – this is vital and should be highlighted by being in a separate section.	216	This will be made clear as part of the drafting process.	noted	
Term 'relatively flexible' powers very wide. Suggest 'relatively flexible' be remove	216, 217	agreed these terms will be removed	accept	
Reference to Canal Reserve being legal Town Belt seems incorrect. Although it was in the Wellington City Reserves Act 1871 and the 1873 Deed the Town Belt, the Basin Reserve and Canal Reserve were always listed separately with their own schedules. Even if within this Bill can it be listed separately.	216, 217	There is no convincing historical or legal reason for not regarding the Canal Reserve as part of the Town Belt proper. Retaining it under the deed will continue to provide protection for this important piece of open space.		
I understand that under the 1873 Deed that Wellington City Council has the sole right to manage the Town Belt, but have concerns that under the proposed legislation the Council will have the right to construct or authorise buildings that the council consider suitable and will remove the Town Belt from being subject to the Reserves Act 1977.	230	The Council currently has the right to construct or authorise buildings under the deed and the Reserves Act 1977. The change from the Reserves Act will not change this power.	noted	
I partly support the proposed legislative changes and believe that the process should take place with speed and thoroughness. I do not support significantly increased powers for the Council	250		noted	
PWT supports the Council's draft Town Belt Management Plan and the legislative changes that have been proposed.	254		noted	
You should therefore change the legislation to recognise the network concept, and provide a range of management purposes reflecting ecological, historical, transport and landscape values	255	The Statutory Principles in the bill must be adhered to when any decisions are made regarding the governance of the town Belt.		

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<p>I no longer believe that any local legislation is required the solutions proffered in this document seem to be removing the involment of citizens and creating a complex Bill that will subsume the present Deed</p>	<p>32</p>	<p>There will be no change in public involvement. The consultation provisions will be similar to those in the Reserves Act. While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency.</p>	<p>noted</p>	<p>change section 12 of the drafting instructions to. <i>The Bill will be a</i> <i>Bill for the Legal Town Belt is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i></p>
<p>I now support the status quo noting that the Town Belt Deed 1873 preserves in perpetuity the Town Belt and that it allows for the inclusion of the Outer Town Belt and the Miramar Peninsula with no less complexity than that will is being offered in the proposed Bill.</p>	<p>32</p>		<p>noted</p>	
<p>I am concerned that the proposed legislation might give Elected Representatives of Wellington City Council disproportionate powers which they will delegate to their Chief Executive. WCC trustees are not beneficial owners of the Trust. The Trust Deed specifically gifted the land to the citizens of Wellington. Wellington City Council currently manages the Town Belt as Trustees only</p>	<p>32</p>	<p>The legislation is not about changing the delegation between the Council and officers. The Council will have similar powers that they have currently under the Reserves Act 1977.</p>	<p>noted</p>	
<p>. I note that there is a reassurance given that the Town Belt will be managed in accordance with a management plan. There must be provisions within the proposed Bill to ensure ongoing public consultation on all or any matters that arise in relation to a TBMP and if needs be provisions and procedures for challenge of any decisions made.</p>	<p>32</p>	<p>There is a section in the drafting instructions (25) outlining the need for a management plan and the process, including consultation required.</p>	<p>noted</p>	
<p>Defining the land: The word "Voluntarily" should be deleted from</p>	<p>32</p>	<p>The word voluntarily emphasises that the Council has no power to sell land but that other agenices such as the Crown can still take land for a public work under the Public Works Act</p>	<p>reject</p>	

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the following sentence. "I support the intention that the Council will have no power to voluntarily sell, exchange or use as security any part of the Town Belt".	32		noted	
4.2 Adding new land: Noted 4.3 Legal status: The Town Belt Deed must remain the prime document and therefore all of it must remain and apply to the town belt as it is in 2012. I do not support any retroactive legislation in regards to the Town Belt Deed 1873 and its relevance. Nor do I support any provisions in the Bill that will make the Town Belt Deed subordinate to the new legislation.	32	While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency. However there could be greater clarity in the wording.	noted	change section 12 of the drafting instructions to. <i>The Bill will be a code for how the Legal Town Belt is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i>
Comment I am not a lawyer but as already stated I am extremely concerned at the term criteria to be considered. These need to be determinants or requirements when translated into legislation	36	The legislation will provide a legal framework for the management of the Town Belt. The management plan will provide a set of rules or criteria for reviewing the types of activities that can take place.	noted	
Modernising and simplifying the legislation for the town belt, along with a guiding set of principles will lead to improved governance and management	44		noted	
applaud the Council's initiative to simplify the legislation for the Town Belt and I support the guiding principles to ensure the Town Belt areas remain undeveloped for the citizens of Wellington to use for recreation outdoors	4		noted	
It is sensible to clarify the legal framework governing the Town Belt.	54		noted	
I believe the legislative framework is necessary to give legal status to protecting the Town Belt.	73		noted	
The Wellington Civic Trust (the Trust) views the proposed new statute as being a welcome initiative on the part of the present Council. It is gratifying that the passing of the Act, hopefully within the term of the present Parliament, will enable a significant area of Original Town Belt land to be returned to its proper status.	77		noted	

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<p>. Another laudable feature of the drafting guidelines is the inclusion in the statutory principles under subsection 14.3 of the concept of the Original Town Belt including the instructions of the New Zealand Company. Having this explicitly set out in the Act will highlight the historical significance and the unique status of the Town Belt. It will also remind future generations of the founding ideals.</p>	77		noted	
<p>There is nothing to support the reprehensible proposal that the Town Belt be removed from protection under the Reserves Act 1977</p>	86	<p>Relevant parts of the Reserves Act are going to be included in the local bill. In place of sections 17 and 40 of the Reserves Act, the local Act will require Council to have regard to and seek to apply the statutory principles. It is expected that the statutory principles will cover much of the same ground as section 17 ("Recreation Reserves"), including freedom of entry and access. In place of the right of objection (s120 Reserves Act), the local bill will identify when public notification will occur eg for the granting of leases/licences, construction of building etc. However the final decision will be with trustees rather than the Minister. There will be no or very little change to the current powers of the administering body because most decisions regarding Recreation Reserve are delegated back to Council (s42-52 Reserves Act). The local bill will have stronger safeguards for granting easements than the Reserves Act (s48).</p>		
<p>the officer said that the Town Belt proposal was "just to clarify & tidy up the Deed of Settlement." 3/ An examination shows this to be specious & not supported in the documentation. 4/ For instance, a full legal opinion specifying all the difficulties presented by the Trust Deed does not support this claim.</p>	86	<p>The primary purposes of the bill are to resolve the existing legal complexities: improve and modernise the governance arrangements for the Town Belt under the 1873 Deed.</p>	noted	

	The Trust Deed should be paramount & should not be watered down by lack of clarity	86	While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency. However there could be greater clarity in the wording.	noted	change section 12 of the drafting instructions to. <i>The Bill will be a code for how the Legal Town Belt is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i>
	We do not agree the Council should given "flexible powers" to manage the Town Belt.	88	The modern approach is to limit the <u>purpose</u> for which powers may be exercised and the <u>process</u> that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10). Can change the wording to emphasise "power" in general.	accept	Provide Council with relatively-flexible powers to manage the Legal Town Belt, provided that it does so in a way that is consistent with both the charitable purpose of the 1873 deed, and the management plan in force at the time, and the principles in paragraph 14 below.
	. I oppose the changes in the legislation that grant the council more powers over the Town Belt. The 1873 Deed which gifted the land to the people of Wellington should remain the governing document of the Town Belt. The Town Belt should remain as the Deed states a public recreation ground for the inhabitants of the City of Wellington. The legislation will interpret the Deed's public recreation ground "as applying to circumstances as they arise" .	92	While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency. However there could be greater clarity in the wording. The proposal is now to develop a definition of recreation that will be included in the bill.		change section 12 of the drafting instructions to. <i>The Bill will be a code for how the Legal Town Belt is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i>

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<p>The changes in legislation are very likely to mean that previously proposed projects for development on the Town Belt (for examples the gondola and restaurant on Mount Victoria ,, private driveways over the Town Belt (e.g. Mary Seddon Wadestown), more educational facilities and large memorial structures (Greek memorial) would be very likely to be permitted</p>	92	<p>The bill will not allow activities that do not fit with the recreational nature of the Town Belt and within the proposed definition of recreation and recreation ground. Private encroachments are prohibited under the Town Belt Management Plan . Encroachment licences are approved on a case by case basis depending on circumstances (see section 9.6.9 in the plan.</p>	noted	
<p>I support the council having the legal right to return former Town Belt land to Town Belt trust status</p>	92		noted	
<p>I believe that Council and the public need a wider discussion</p>	96	<p>There has been much discussion over the past two years including the development of guiding principles and now consultation on the drafting instructions. There will be further consultation on the draft bill prior to its entry into Parliament. The Town Belt has a unique governance framework under the Deed.</p>	noted	
<p>about the opportunities for modernising governance arrangements before Council proceeds with designing the legislation that will underpin the future governance arrangements. I reached this view after considering the following:</p>	96			
<p><input type="checkbox"/> Council has acknowledged that it wants relatively flexible powers. <input type="checkbox"/> Council has identified two constraints on those powers.</p>	96			
<p>o the charitable purposes of the Town Belt Deed, but the discussion document did not offer any explanation of what that means in practice.</p>	96	<p>The bill will outline the obligations of the trustees to manage the trust in accordance with the provisions of the bill and the Deed.</p>		
<p>o the requirement for consistency with the management plan in force at the time.</p>	96	<p>The operative plan will undergo a minor review at the time of enactment to ensure it is consistent with the new legislation.</p>		
<p><input type="checkbox"/> There is very little information about the proposed form of the management plan in paragraph 25 of the drafting instructions for the new legislation.</p>	96	<p>The Management Plan format will be similar to the current plan. There is no need to be too prescriptive as to its form .The Reserves Act is similarly broad in its requirements.</p>		

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<p>Removal of the Reserves Act requirements opens up the possibility of introducing a very different style of management plan. The Town Belt Management Plan to be passed in 2013 is likely to contain at least 200 pages. Would modern governance arrangements generate a management plan of a similar size and style? Does it have to be a 10-year management plan?</p>	96	<p>There is some value in a regular (3 yearly) minor review of the management plan with an overall review after 10 years. Any future review should not be as major as the current review.</p>	noted	
<p><input type="checkbox"/> Are there other forms of planning document that could be used to guide strategic and operational decision-making for the Town Belt? Do we need a planning document that would facilitate improved monitoring of performance and results?</p>	96	<p>The document Our Capital Spaces that will be consulted on in June 2013 will provide high level strategic direction for the open space network including the Town Belt. The Management Plan should be seen as the only other document (along with the guiding principles) to provide direction over the next ten years.</p>	noted	
<p>If Council is serious about improving the governance arrangements for the Town Belt, I recommend that it postpones development of the Bill to allow time for a discussion of the current and proposed governance arrangements. The discussion could address questions such as:</p> <ul style="list-style-type: none"> <input type="checkbox"/> What are the key components of a good governance system? <input type="checkbox"/> How do the current Town Belt governance arrangements operate? <input type="checkbox"/> How do the Town Belt arrangements compare with the governance arrangements for other parts of Council's land, e.g. recreation services, the Botanic Garden, Basin Reserve, Wellington Zoo, and? <input type="checkbox"/> Why does Council operate such different systems? 	96	<p>The Council has carried out an assessment of the current and future governance of the Town Belt. This work commenced in 2002 with the proposed development of a local Town Belt bill. The need for legislative change was identified in the 1995 Management plan.</p>	reject	

<p>□ How satisfied are the public and councillors with the current governance practices for the Town Belt? □ Are the current delegations appropriate, i.e., are all decisions made at the most appropriate level □ Does Council receive the information it needs to review the Chief Executive's performance in managing the Town Belt? □ Can we learn anything from other urban councils? 6. If the public is going to support new legislation, we need to be sure that it is part of a governance system that will protect the essence of the Town Belt and ensure that it is well-managed. The legislation should not be developed in isolation from other elements of the governance system.</p>	96	see above comments.	noted	<h2 style="text-align: center;">APPENDIX 2</h2>
<p>I have concerns about legislation that would provide Council with "relatively flexible powers". The two constraints on those powers do not provide sufficient reassurance. The following examples illustrate some aspects of this concern. □ Drafting instruction 14.4 proposes allowing Council to lease up to 40 hectares of Town Belt. There were no details of the total current area leased in the FAQs. □ Some of Council's intentions about the future of the Town Belt are evident in the draft TBMP through statements such as: "However, elite sport and associated events are important to Wellington as a destination for major events, entertainment, and also to provide a pathway for talented young people to develop their skills and develop a careers in elite or professional sport. Such sport can sometimes bring in external funds to improve facilities that can in turn benefit community sport". On the Town Belt, public use has to take priority over specialised uses. Specialised uses can be catered for on other reserves, on private land or elsewhere in the Wellington region</p>	96	<p>The modern approach is to limit the purpose for which powers may be exercised and the process that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10). The "relatively flexible powers" under the proposed drafting instructions are "full capacity for the purpose of performing [Council's] role as a trustee of the Legal Town Belt". These will be subject to: 1.1 The normal decision making provisions of the Local Government Act 2002. Compliance with the Management Plan; and 1.2 Having regard to and seeking to apply the statutory principles. The current leased area is 5.9ha.</p>		

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<p>Based on Council’s wish for “relatively flexible powers” and the first draft of the drafting instructions, my view is that the 1873 Deed should prevail in the event of any inconsistencies between the Deed and the legislation</p>	<p>96</p>	<p>While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency. However there could be greater clarity in the wording.</p>	<p>noted</p>	<p>change section 12 of the drafting instructions to. <i>The Bill will be a code for how the Legal Town Belt is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i></p>
<p>Wellingtonians are protected adequately by the Trust Deed. I object that this protection will be diminished by the new proposals.</p>	<p>97</p>	<p>While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency. However there could be greater clarity in the wording.</p>	<p>noted</p>	<p>change section 12 of the drafting instructions to. <i>The Bill will be a code for how the Legal Town Belt is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i></p>
<p>The Town Belt Guiding principles will better support governance of the Town Belt in alignment with the original intent of the town Belt deed.</p>	<p>62</p>		<p>noted</p>	
<p>A further statutory principle that could be added would require all requests for leases, licences, and easements to be subjected to a test of demonstrating that no alternative land is available outside the boundaries of the Legal Town Belt.</p>	<p>77</p>	<p>This requirement is already in the draft Town Belt Management Plan and is a specific rule best placed in the Plan rather than legislation.</p>	<p>reject</p>	

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<p>Clause 25.3 and 25.5 No more than 10 years between Mngt Plan reviews compliance with Mngt Plan in force at time council comes to exercise its functions It appears there could be a problem in the transition between the implementation of the new legislation and the continued use of the current management plan if that has only been adopted say one year before. Clear transition arrangements should be defined..</p>	<p>63</p>	<p>We will define the transition arrangements but the intent is that this plan will become the operative plan at the time of enactment of the bill. This may require a slight amendment to the plan at the time of enactment.</p>		
<p>The town Belt has limited protection and not a high standing in the District Plan. Its own management under a separate statute is critical for protection of this key asset.</p>	<p>231</p>		<p>noted</p>	
<p>Position of town Belt curator be required in the new statute. This would be a senior Parks and Reserves Officer.</p>	<p>237</p>	<p>Any management and resourcing requirements for the town Belt are best outlined in the management plan.</p>	<p>reject</p>	
<p>This needs an omnibus bill and the Council is attempting to grant itself unreasonably broad powers. The Council is attempting grant itself powers over land that has been under Maori customary title .</p>	<p>246</p>	<p>The proposed bill will modernise the existing arrangements that have been in place since 1873 when the Trust Deed was signed. The proposed bill will clarify and interpret Council's existing powers.</p>	<p>noted</p>	
<p>I am concerned that the proposed changes to legislation and policy abolishes present restrictions on the council and allows for reduction of protection for the Town Belt. I would like to see some amendments that provide greater certainty for the protection of this valued and popular Wellington amenity.</p>	<p>100</p>	<p>The proposed bill will not reduce protection of the Town Belt but will modernise the legislative framework</p>	<p>noted</p>	
<p>The Town Belt Local Legislation – Drafting Instructions – nos, 1 -27. It is clear that Council and unelected council officers are given wide powers that over-ride many existing protections provided by the Deed 1873</p>	<p>100</p>	<p>The modern approach is to limit the purpose for which powers may be exercised and the process that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10). Can change the wording to emphasise "power" in general.</p>	<p>noted</p>	

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<p>I support the part of the Bill which states that “it is intended that the Council will have no power to voluntarily oppose sell, exchange or use as security any part of the Town Belt</p>	<p>100</p>		<p>noted</p>	
<p>We support the Council’s legislative guidelines, designed to simplify management of the Town Belt, and to protect the Town Belt from development into the future.</p>	<p>103</p>		<p>noted</p>	
<p>Modernising and simplifying the legislation for the town belt, along with a guiding set of principles will lead to improved governance and management</p>	<p>107</p>		<p>noted</p>	
<p>We support legislation to legally add land already managed under the Town Belt Management Plan, and future possible additions, to the Town Belt thus bringing it under the provisions of the Deed.</p>	<p>109</p>		<p>noted</p>	
<p>so it is with some concern that we note the potentially open ended changes in the management plan. Specifically giving council officials the legal right to change recreation usages 'to circumstances as they arise' <input type="checkbox"/> removing the Town Belt from the Reserves Act <input type="checkbox"/> giving the Council 'flexible powers' over the Town Belt land.</p>	<p>124</p>	<p>The term recreation will be defined in the bill. This will be consulted on. Relevant parts of the Reserves Act are going to be included in the local bill. In place of sections 17 and 40 of the Reserves Act, the local Act will require Council to have regard to and seek to apply the statutory principles. It is expected that the statutory principles will cover much of the same ground as section 17 (“Recreation Reserves”), including freedom of entry and access. In place of the right of objection (s120 Reserves Act), the local bill will identify when public notification will occur eg for the granting of leases/licences, construction of building etc. However the final decision will be with trustees rather than the Minister. There will be no or very little change to the current powers of the administering body because most decisions regarding Recreation Reserve are delegated back to Council (s42-52 Reserves Act).</p>	<p>noted</p>	
<p>The Council should stick faithfully to the spirit of its original trusteeship and not adopt powers appropriate to owners but not to trustees.</p>	<p>124</p>	<p>The Town Belt will continue to be managed in trust</p>	<p>noted</p>	

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I do not support the council being given more powers over the Town Belt.		The new bill will codify the various powers of the Council as trustee. The Management Plan sets out policies that will be carried out by officers. There are no specific changes to the current delegations proposed as a result of the local bill.		
I oppose legislation and policies that allow council to have "flexible powers", that allow ".....commercial activities and events" (Pg 10) and construction of buildings considered "desirable" to decision makers. (pg 18)	100	All of these activities can occur under the current legislative framework subject to the policies in the management plan.	noted	
The Deed required that the Town Belt be used as a "public recreation ground". This concept is clear and unambiguous. There is no place here for ambiguous words and phrases such as "flexible powers" or unelected council officials having the legal right to define what is recreation in the Town Belt in "circumstances as they arise". The Council should not have the right to construct or authorize the construction of buildings it "considers desirable	110	The terms recreation and recreation ground will be defined in the bill. Buildings can be constructed under the current legislative framework subject to policies in the operative management plan. This will not change.	noted	
8.1 The Drafting Instructions note that those parts of the Canal Reserve which have not become legal road are Legal Town Belt (paragraph 8.2). This is because the 1873 Trust Deed originally included the Town Belt, and the Basin and Canal Reserves. The Basin Reserve is now held under a separate Trust Deed (the 1884 Trust Deed) but the Canal Reserve remains part of the Legal Town Belt.	113			
8.2 We suggest that the inclusion of the Canal Reserve in the Town Belt is now an historical anomaly, and that the land should be formally excluded from the Town Belt.		The Canal Reserve will remain part of the legal Town Belt and included in the bill. It is important to retain the open space character of this strip and prevent development in the future.	reject	

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<p>8.3 The Canal Reserve was originally intended to run from the waterfront to the 'Basin Lake' at the end of Kent Terrace and to enable barges to deliver goods to Newtown warehouses. However, 'Wellington's miniature Venice' vanished when the 1855 earthquake struck, raising the land in this area.</p>				
<p>8.4 Since that time, the Canal Reserve has evolved considerably so that today it contains a series of landscaped traffic islands, and sections of road reserve.</p>				
<p>8.5 This area has none of the special characteristics of the Town Belt, and does not require the same governance or management regime.</p>		<p>see above</p>		
<p>8.6 We note that the Draft Plan does not deal with the Canal Reserve and it may be Council's intention to remove this reserve from the Town Belt. The NZTA can certainly appreciate reasons for doing so.</p>		<p>The plan does not include the Canal Reserve but it will still be covered by the provisions of the proposed bill.</p>	<p>reject</p>	
<p>8.7 However, if this is not Council's intention, provision needs to be made within the Management Plan to specifically allow for existing and future roading and infrastructure requirements where reasonably necessary for achieving roading and infrastructure outcomes of the Council or any requiring authority.</p>	<p>113</p>			
<p>The Council should not have the automatic legal right to construct buildings "it considers desirable".</p>	<p>88</p>	<p>The Council can do that under the current governance framework subject to the policies in the management plan and any resource consents required. This will not change.</p>	<p>noted</p>	
<p>Neither should WCC have the right to construct or authorise construction of buildings on the Town Belt. The proposed new plan should contain words "that no additional land be developed for organised recreational facilities (formal recreation) in the Town Belt". The essence of the TB is its open space for public enjoyment</p>	<p>134</p>	<p>The Council can construct new buildings under the current management plan and governance framework. This will not change.</p>	<p>noted</p>	
<p>I don't like to see any historic legislation repealed that will put a brake on proposals.</p>	<p>203</p>	<p>All historical legislation will be assessed to ensure it is no longer needed prior to it being repealed</p>	<p>noted</p>	

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<p>I am not sure what are the parts of the The Wellington City Reserves Act 1871 and the Wellington City Reserves Act 1872; and 27.2 The Wellington (City) Town Belt Reserves Act 1908. that are in conflict with or redundant. I don't have concerns about redundant powers if these are included in the new legislation but am concerned/suspicious over the ones that are said to be 'in conflict.' Why are they in conflict?</p>	203	<p>This will be assessed at the time of drafting. For instance the 1908 Act may be in conflict if the Council wishes to change the area that can be leased.</p>	noted	
<p>Principles 14. We do not agree with making the guiding principles statutory. There was considerable opposition to aspects of these in the 2011 Town Belt workshops and public submission. Particularly the principles on joint management with mana whenua, and that with 'sporting hubs'. The principles should only be included in the non-statutory TBMP.</p>	209	<p>The guiding principles will form the basis for the statutory principles along with other factors that need to be considered (section 14). These will be further consulted on following drafting of the legislation.</p>	noted	
<p>Council's powers 16.1 We do not agree with the council being given powers to undertake work "which it considers desirable", including "construction of buildings". Again any construction in the Town belt should have to go through a publicly notified consent application. 16.2 The Council should not have the right to restrict the owners of the Town Belt, the public of Wellington, access to the Town Belt, except for reasons of safety.</p>	209	<p>The Council has these powers under the current governance framework under the Reserves Act 1977.</p>	noted	
<p>Why the legislation? (page 19) 5.14 This explanatory section is somewhat confusing – rather the Friends suggest it should indicate “The new Wellington Town Belt Act will be specific and clarify in modern language the basis by which the Council manages the Wellington Town Belt.”</p>	215	<p>The Council will review the consultation document and background wording when it consults further on the draft bill.</p>	noted	
<p>If the Council finalises the proposed revised management plan prior to enactment of the legislation, that revised management plan could apply as an interim plan until such time as final decisions on further addition/adjustments to the extent of land to be subject to the Act can be made.</p>	215		noted	

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No more than 10 years between reviews of the management plan. Would no more than 12-15 years be more appropriate.	217	Ten years is a reasonable time frame and is consistent with the Reserves Act 1977.	reject	
Public hearings and appeal rights need to be explicitly stated under subsection 25.2. In light of the Badminton case, there may be a need to clarify the status of the Management Plan in the context of the Resource Management Act or any succeeding land use and planning legislation.	77	As it stands, the Management Plan is to be considered as a 'relevant matter' as part of the RMA process. However, it will carry less weight than some other instruments, such as the District Plan itself. Under the proposed local Act this will continue to be the case. The Management Plan will need to be considered when assessing matters under the RMA	noted	
The Friends have noted there has been no substantial problem even though the existing management plan was approved in 1995. Therefore, the Friends submit that reviews of plans under the new Act should appropriately be at 15 year intervals rather than 10 years.	215	Ten years is a reasonable time frame and is consistent with the Reserves Act 1977.	noted	
Clause 25.3 and 25.5 No more than 10 years between Mngt Plan reviews compliance with Mngt Plan in force at time council comes to exercise its functions It appears there could be a problem in the transition between the implementation of the new legislation and the continued use of the current management plan if that has only been adopted say one year before. Clear transition arrangements should be defined		Clear transition arrangements will be defined. It may be that a minor change to the plan is required at the time of enactment of the bill.	noted	
. Accordingly, a new paragraph 27 could be added: To ensure both continuity and accountability in the administration of the Act and of the management plan, the Council must formally appoint a senior Parks and Reserves Officer as the Curator of the Town Belt.	77	Any management and resourcing requirements for the Town Belt are best outlined in the management plan.	reject	
Both the addition of land to and removal in future should be by special legislation	215	The bill will provide a process for adding land. However legislative change will be required for removal.	noted	
The Friends are totally opposed to any proposal that will give special rights for commercial use on the Town Belt.	215		noted	

<p>The Friends would wish to know more about the details for special provisions to relate to the Zoo and Chest Hospital</p>	<p>215</p>	<p>The intention of this section is to require the local legislation to be drafted so that, in respect of the Chest Hospital and Zoo, it allows: Use of that land other than 'as a public recreation ground'; and a management regime that will accommodate using that land: As a zoo; and as a premises available to be leased for community purposes (such as the current lease to the Wellington SPCA).The principal differences between the Chest Hospital and Zoo, as opposed to the balance of the Town Belt, will be the need to: Exclude the public from parts of the Chest Hospital and Zoo (including in some circumstances requiring an admission fee); and Manage the Chest Hospital and Zoo for purposes other than recreation. For example, the Wellington SPCA is not a recreation purpose. Nor are some of the Zoo's functions (such as the veterinary hospital, conservation and education activities, function centre, café and gift shop) aligned with recreation.</p>	<p>accept</p>	<p>more detail will be included in the drafting of the bill. APPENDIX 2</p>
<p>The Friends submit that as part of the original Town Belt, the Wellington Botanic Garden should also be covered by special provisions in the intended legislation. There may well be a strong case for the Wellington Show Buildings to also be included with perhaps the Truby King site as well.</p>	<p>215</p>	<p>At the moment the Botanic Garden is vested in Council pursuant to the Wellington Botanic Garden Vesting Act (WBGVA) 1891 and is managed separately from the Town Belt. The Botanic Garden is not part of the trust that was settled by the Deed in 1873.</p>	<p>reject</p>	<p>We recommend that the drafting instructions be amended to provide a mechanism whereby any land no longer required for the Botanic Garden would become Legal Town Belt. The Botanic Garden will continue to be subject to the WBGVA.</p>
<p>We should like to see the principles before making any detailed comment, but the proposed basis for them seems reasonable.</p>	<p>84</p>		<p>noted</p>	
<p>I am pleased the statutory principles will be based on three documents – 1839 instructions re 'public property' and 'not to be built upon'. The 1873 Deed – to be used 'as a public recreation ground for the inhabitants of the City of Wellington' and the Principles adopted in 2011.</p>	<p>217</p>		<p>noted</p>	
<p>16.1 'Constructing' buildings. This is very wide powers – should it at least specify limited to supporting outdoor recreation activities or essential infrastructure where no alternative is available.</p>	<p>217</p>	<p>These are the same powers the Council has now under the governance framework and in particular the Reseves Act 1977</p>	<p>noted</p>	

<p>The founders of Wellington had a great vision in making it reserved land stressing that it was “to be public property on condition no buildings be ever erected on it”. In this regard have concerns under “What are the key things that the Bill will do?” (Page 18 of the document) – bullet point 4 – Provide the Council with relatively flexible powers to manage the Town Belt, provided that it does so in a way that is consistent with both the charitable purpose of the Town Belt Deed and the management plan in force at the time” The 1873 Deed should remain the governing document of the Town Belt.</p>	230	<p>While the drafting instructions are intended to be consistent with the 1873 deed, it is always possible for arguments to be made in the future that one legal instrument is not entirely consistent with another. For this reason it is very desirable to provide that the local legislation takes precedence over the 1873 deed. Without such a provision, there may be legal uncertainty regarding which source should prevail in the event that a party identifies an alleged inconsistency. However there could be greater clarity in the wording.</p>	noted	<p>change section 12 of the drafting instructions to. <i>The Bill will be a</i> APPENDIX 2 <i>Bill is governed. Following the Bill's enactment, the legal status of the Legal Town Belt will be sourced primarily from the Bill, rather than the underlying 1873 deed</i></p>
		<p>The modern approach is to limit the purpose for which powers may be exercised and the process that must be followed when exercising them. For example, this is the approach of the Local Government Act 2002: Council has "full capacity" for the purpose of performing its role (which in turn is to give effect to the purpose of local government stated in section 10). Can change the wording to emphasise "power" in general.</p>	accept	<p>Provide Council with relatively flexible powers to manage the Legal Town Belt, provided that it does so in a way that is consistent with both the charitable purpose of the 1873 deed, and the management plan in force at the time, <u>and the principles in paragraph 14 below.</u></p>
<p>We are very pleased to see a proposed mechanism for adding new land, but none for removing it, and also that the Wellington City Council will have no power to voluntarily sell or exchange any part of the Town Belt</p>	84		noted	
<p>However, Section 16 seems unnecessarily broad and causes us misgivings, especially 16.1, which leaves the way open to any future development which the Council may wish to undertake.</p>	84	<p>These are very similar conditions to those the Council has under the current governance framework and in particular the Reserves Act 1977</p>	noted	
<p>The guiding principles for the Town Belt should be non-statutory.</p>	88	<p>The guiding principles will form the basis for the statutory principles along with other factors that need to be considered (section 14). These will be further consulted on following drafting of the legislation.</p>	noted	
<p>Guiding Principle 5 should not be enshrined in legislation without further advice from ecologists and potentially further public consultation</p>	96	<p>This principle will be reviewed</p>	noted	

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<p>This instruction needs further consideration as there may be efficiency gains in adding the Basin Reserve to the Town Belt and defining it as a special area. The Deed shows that the Basin Reserve is for the purposes of a cricket and a recreation ground.</p>	96	<p>The Basin Reserve is governed under the 1884 Basin Reserve Trust Deed. It is no longer covered under the Town Belt Deed.</p>	reject	
<p>A Deed of Conveyance of the Basin Reserve between the Crown and the Governor- General of New Zealand to the Wellington City Council was approved in 1884 that established that the ground was to be "forever used for the purposes of a cricket and a recreation ground by the inhabitants of Wellington". The same arguments that are being applied to the definition of 'public recreation ground' on the Town Belt could be applied to the Basin Reserve as long as the ground is still available for cricket.</p>	96		noted	
<p><i>Objective of local bill needs to be non-controversial. The plan is clearly controversial. Submissions raise many things to be done. Don't want controversial bill given to local MP to sponsor. Suggest re-do drafting instructions, based on submissions, consult again</i></p>	86 oral	<p>The draft bill will be consulted on prior to it being introduced to Parliament. There is plenty of time for further change and discussion .</p>	noted	
<p>The provision of up to 40 hectares of area to be leased (14.4 of the Town Belt Legislation – Drafting Instructions) is grossly excessive</p>	86	<p>The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares</p>	noted	
<p>I agree we must have a maximum and this term (33years) fits neatly in with other government leasing frameworks. However it is a maximum and shorter term leases may be appropriate. I would prefer that lease power was expressed as the minimum appropriate for the situation but no longer than 33 years.</p>	203	<p>The Town Belt Hearings subcommittee have proposed this be reduced to 20 years</p>	noted	
<p>Leasing 18.3 The council should not have the legal right to authorise "any use" of the Town Belt. This seems to us like another attempt to downgrade the Deed which requires the Town Belt be only used as a public recreation ground.</p>	209	<p>the words "any use" would need to be consistent with the definition of recreation and recreation ground in the proposed bill and also with the statutory principles.</p>	noted	

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<p>19.2 We oppose the council being given the right in legislation to authorise "for profit/commercial sub-lease, sub-licence or use of any part" of the Town Belt.</p>	209	<p>This use would need to be consistent with the definition of recreation and recreation ground in the proposed bill and also with the statutory principles.</p>	noted	
<p>The Friends are totally opposed to any proposal that will give special rights for commercial use on the Town Belt.</p>	215	<p>There is no intent for commercial use to be given any "special rights" under the proposed bill.</p>	accept	<p>The main difference between the current and proposed regimes to consider a commercial operation on Town Belt is the requirement under the Reserves Act 1977 that any lease for a "trade, business, or occupation must be necessary to enable the public to obtain the benefit and enjoyment of the reserve or for the convenience of persons using the reserve". We will ensure this intent will be included in the drafting instructions.</p>
<p>The Trust is most concerned that the legislative guidelines and the draft management plan are ambivalent about commercial ventures being on Town Belt land. It is suggested that the Council and its officers should be shielded from being subjected to pressures from commercial interests. Accordingly we would like to see under section 17 an additional clause stating: Council will have no power to: Allow any long-term private commercial activity to take place on the Legal Town Belt.</p>	77	<p>The criteria for commercial activities on Town Belt will be tightened up by inserting some changed wording into the drafting instructions consistent with the Reserves Act approach.</p>	accept	<p>The main difference between the current and proposed regimes to consider a commercial operation on Town Belt is the requirement under the Reserves Act 1977 that any lease for a "trade, business, or occupation must be necessary to enable the public to obtain the benefit and enjoyment of the reserve or for the convenience of persons using the reserve". We will ensure this intent will be included in the drafting instructions.</p>
<p>Area to be leased – 40 hectares is excessive. Although based on the 1908 Act which suggested 100 acres it is certainly not realistic. At present some 5.9 ha are leased. I suggest 8 ha would be more realistic – or the limited remaining flat land may be all leased for formal usage</p>	217	<p>The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares</p>	accept	
<p>I understand that the leased area is currently approx. 6 hectares. 40 hectares would fundamentally change the nature of the Town Belt. I would support a restriction of the leased area to its current size.</p>	76, 96, 237	<p>The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares</p>		
<p>It is our view that the total area to be leased needs to be constrained. It is acknowledged that some allowance needs to be made for flexibility.</p>	77	<p>The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares</p>		

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<p>With the above reasoning in mind, we suggest that the Act specify a maximum of 6 hectares available for leasehold.</p>	77	<p>The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares</p>		
<p>We oppose the Council being able to sub-lease “any part” of the Town Belt for “profit/ commercial” use.</p>	88	<p>The criteria for commercial activities on Town Belt will be tightened up by inserting some changed wording into the drafting instructions consistent with the Reserves Act approach.</p>	accept	<p>The main difference between the current and proposed regimes to consider a commercial operation on Town Belt is the requirement under the Reserves Act 1977 that any lease for a "<i>trade, business, or occupation must be necessary to enable the public to obtain the benefit and enjoyment of the reserve or for the convenience of persons using the reserve</i>". We will ensure this intent will be included in the drafting instructions.</p>
<p>Please encourage the drafters to model the statutory provisions for leases and licences on Part IIIB of the Conservation Act</p>	96			
<p>The "33 years" is way to long. It needs to be a maximum of 20 years, with a provision to cancel a lease if the lessees are not caring for the environment</p>	20	<p>The Town Belt Hearings subcommittee have proposed this be reduced to 20 years</p>	noted	
<p>All leases and licences be publically notified followed by public hearings presided over by independent commissioners. Private commercial ventures be banned</p>	237	<p>Notification and consultation will be required. The criteria for commercial activities on Town Belt will be tightened up by inserting some changed wording into the drafting instructions consistent with the Reserves Act approach. The process for hearings will be consistent with Council standing orders.</p>		<p>The main difference between the current and proposed regimes to consider a commercial operation on Town Belt is the requirement under the Reserves Act 1977 that any lease for a "<i>trade, business, or occupation must be necessary to enable the public to obtain the benefit and enjoyment of the reserve or for the convenience of persons using the reserve</i>". We will ensure this intent will be included in the drafting instructions.</p>
<p>In our view, the Act would have more weight and provide greater clarity by not leaving the definition of “public recreation ground” so open. A possible wording could be: The primary purpose will be to maintain most of the Legal Town Belt as open informal recreation space accessible to the inhabitants of the city at all times, without charge</p>	77	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	noted	

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<p>I oppose unelected council officers having the legal right to decide what the term “public recreation ground” covers, and this term able to be “...interpreted as applying to circumstances as they arise.....how the words are interpreted will not be frozen</p>	<p>100, 209</p>	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	<p>noted</p>	
<p>The proposal giving unelected council officials the legal right to define what is recreation, is not acceptable</p>	<p>202</p>	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	<p>noted</p>	
<p>11.3 The paragraph appears to be a 'carte blanche' for the Council. A reference to the Management Plan (25.5) would be useful here.</p>	<p>217</p>	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	<p>noted</p>	
<p>I can only guess at the meaning of the phrase “to forever hereafter use and appropriate the Legal Town Belt as a public recreation ground...”. I oppose the intent to interpret the term “public recreation ground” to circumstances as they arise</p>	<p>96</p>	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	<p>noted</p>	
<p>The new legislation provides an opportunity to introduce an enduring definition of public recreation ground. I suggest wording the new definition around activities that are “allowed” in Section 9 of the draft TBMP supplemented by some of the “ managed” activities.</p>	<p>96</p>	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	<p>noted</p>	
<p><i>The definition of recreation – activity not work – has not changed since 1873. Eg looked at Dictionary from around when deed signed = “refreshment after toil”. No change in definition after 140 years. Words not “frozen”? Nothing has changed in terms</i></p>	<p>242</p>	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	<p>noted</p>	
<p>Themes F and H Term “recreation” needs to be defined probably by specifying what activities are excluded in the “Interpretation of terms in the Bill (Act)</p>		<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>	<p>noted</p>	
<p>I oppose giving the council the right to interpret the Deed's term public recreation ground "as applying to circumstances as they arise"</p>	<p>88, 134, 191, 217</p>	<p>It is proposed that a definition be prepared and consulted on once the bill is drafted.</p>		
<p>While we appreciate that the Drafting Instructions are high-level and do not cover every detail, we consider that they may be misleading in that they omit to deal with the PWA and powers under the PWA, to acquire land for public works.</p>	<p>113</p>			

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<p>We assume that the Council was not intending to exclude powers under the PWA; any such attempt would be unprecedented as far as we are aware.</p>	113	<p>The Council has no intention to propose that the bill exclude powers under the Public Works Act.</p>	noted	
<p>We also note that excluding the PWA may indeed be inconsistent with the original purpose of the Town Belt. For example, the Wellington City Reserves Act 1871, envisaged that parts of the Town Belt may be required for public works and utilities, including roading. For example, section 4 of that Act provides (emphasis added):</p>	113	see below		
<p>We therefore suggest that the Drafting Instructions clarify that it is not intended that the new local legislation override the normal provisions of the PWA which govern the acquisition of land for public works, and that the provisions of that Act apply as appropriate in all circumstances.</p>	113		noted	Added to drafting instructions
<p>The power to grant restrictions on access and to charge for admission is in contradiction to the whole ethos and the founding values for the Town Belt. This power, we suggest, should be confined to exceptional circumstances such as special events, and should be temporary. This approach would underpin the policy of sporting groups sharing facilities as opposed to being accorded exclusive use.</p>	77	<p>These are the same powers the Council has now under the governance framework and in particular the Reserves Act 1977. Detailed policies within the Management Plan can identify when these restrictions will occur.</p>		
<p>The power to authorise construction or retention of buildings could be accompanied by the proviso: 20.3, provided they are at all times maintained in good condition.</p>	77	<p>This gives Council a general power to authorise construction or retention of buildings. The ways it uses these powers will be outlined with the management plan.</p>	reject	
<p>Please reword as follows. Restricting public access to parts of the Town Belt to the limited extent necessary to enable work to be carried out safely or to facilitate temporary activities such as sporting events". The word 'limited' needs to be applied to the area closed and the length of the period of closure</p>	96	<p>The wording " such as sporting events" is fine as it helps define the meaning of the term "temporary event" not sure the word limited is needed as it really does not further define temporary. Better to specify periods rather like the Reserves Act which outlines 40 days of the year for charging (section 53 (1) (d)</p>	partly accept	

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<p>. Although proper maintenance can be seen as solely a housekeeping issue, by stipulating this as a statutory requirement, it puts the onus on Council and leaseholders to respect the special status of the Town Belt and to perceive a permission to build or retain as a privilege, not a right</p>	77	<p>Maintenance is hard to define and really best left as a policy within the operative Management plan rather than within the drafting instructions</p>	reject	
<p>The notification of easements and rights of way also needs to be subject to public hearing</p>	77	<p>This is proposed in section 22 of the drafting instructions</p>	noted	
<p>Must maintain an up-to-date register of all easements and rights of way granted and the conditions attaching to each.</p>	77		noted	
<p>The conferring of an existing easement to another party is a power that needs a transparent process. A proviso could be added to subsection 23.2 requiring public notification etc and an assessment of whether alternative sites exist outside the Town Belt.</p>	77	<p>The existing easement or "right" for the public infrastructure will be accepted as existing. There will be no approval or reassessment for these. There is no requirement for additional consultation.</p>	reject	
<p>Some mention could be made of the Show Buildings site on John Street and that, should the building no longer be needed by the National Schools of Dance and of Drama, the site be returned to the Legal Town Belt. The same could apply to the Botanic Gardens, although there is little likelihood of any of that land becoming available. These sites being mentioned in the Act would serve as a reminder that they were originally part of the Town Belt and thereby have a longstanding historical significance.</p>	77	<p>The Botanic Garden and the show building site will be referred to within the bill and their historical links to the Town belt acknowledged.</p>	accept	<p>Include these sites in the preamble.</p>
<p>As written, 19.2 may contradict the reassurance given in the FAQs that the drafting instructions do not make it easier for Council to allow commercial uses of the Town Belt. An explanation of the difference between the decision-making processes for "granting" compared with "authorising" may help. Understanding such distinctions may be an important part of understanding the current governance system.</p>	96	<p>It is recommended to make the commercial tests the same as that currently within the Reserves Act 1977.</p>	accept	<p>The main difference between the current and proposed regimes to consider a commercial operation on Town Belt is the requirement under the Reserves Act 1977 that any lease for a "trade, business, or occupation must be necessary to enable the public to obtain the benefit and enjoyment of the reserve or for the convenience of persons using the reserve". We will ensure this intent will be included in the drafting instructions.</p>

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17.3 'Act in a way that does not comply with the management plan...'. Should this be stronger with at least reference to no non-recreational activity (other than essential utilities) no new formal sporting or club facilities outside existing areas, limitations to commercial use.	217	This is a link between the powers in the legislation and the plan. The more detailed rules and policies are best outlined within the plan.	noted	
Please identify any legal mechanisms (other than the Management Plan) under which Council could set conditions or rules to regulate use of the Legal Town Belt. Does this refer only to by-laws?	96	The Council can set specific rules under the Public Spaces by law. The intent is to include these within the management plan but this does not propose to be exclusive. Other methods could be used.	noted	
oppose the removal of the Reserves Act 1977	88,90, 100, 110, 134, 157, 191, 197	The term recreation will be defined in the bill. This will be consulted on. Relevant parts of the Reserves Act are going to be included in the local bill. In place of sections 17 and 40 of the Reserves Act, the local Act will require Council to have regard to and seek to apply the statutory principles. It is expected that the statutory principles will cover much of the same ground as section 17 ("Recreation Reserves"), including freedom of entry and access. In place of the right of objection (s120 Reserves Act), the local bill will identify when public notification will occur eg for the granting of leases/licences, construction of building etc. However the final decision will be with trustees rather than the Minister. There will be no or very little change to the current powers of the administering body because most decisions regarding Recreation Reserve are delegated back to Council (s42-52 Reserves Act).	reject	
Unclear as to what benefit, if any, there is to removing the Town Belt outside of the Reserves Act 1977, which appears to provide an extra safety net for Wellingtonians wanting to preserve the Town Belt.	193	see above		

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<p>The Town Belt idea has community support because it is seen as providing strong legal protection for public open space. That legal protection is there, but is probably over-estimated by the community. The Reserves Act would provide similar protection.</p>	255	see above		
<p>But it does have community recognition (brand value), so it should be kept.</p>	255	see above		
<p>Exclusion from the provisions of the Reserves Act raises the question of what legal redress the public will have if there is widespread concern over the decisions made by the Council as Trustees.</p>	77	The Council will have obligations that will be subject to:the normal decision making provisions of the Local Government Act 2002.	noted	
<p>12. The reasoning behind exclusion from the Reserves Act as set out on page 19, "Frequently Asked Questions", appears to uphold the need for greater certainty and clarity. This, however, should not be at the expense of fundamental legal rights and due process. Rights of appeal need to be explicit</p>	77	see above		
<p>I was not convinced by the reasons presented on page 18 of the discussion document for taking the Town Belt out from under the Reserves Act. More details about the specific responsibilities of the trustees under a charitable trust compared with the responsibilities of councillors under the Local Government Act may help, but are unlikely to provide the level of protection provided by the Reserves Act, case law and current best practice.</p>	96	see above		
<p>Easements and rights of Way 22. and 23.2. The council should not have the legal right to grant easements over the Town Belt. Easements are property rights granting them would in our opinion be contrary to the Deed ("without any power of the said trustees to (alienate) or dispose of the same".).</p>	209	Easements will be granted for any public purpose subject to the statutory principles which will be broadly based on the 1873 deed and guiding principles	noted	

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<p>This provision appears to wipe the slate clean. In other words, any decisions made by previous Councils that may have been in contravention of the Deed will henceforth be considered legal. The public may be more willing to “wipe the slate clean” if Council commissions and releases an independent report into any decisions that would be legalised by this provision.</p>	209	<p>There is Council-owned infrastructure, such as storm water drains, on Town Belt. There is no guarantee that infrastructure was built in accordance with the Deed and the Reserves Act 1977. The intention is that, under the local Act, the legal basis for any future infrastructure will be clear. Paragraph 23 would simplify the legal position for Council and create certainty for the community by regularising what has occurred in the past.</p>	noted	
<p>Strongly support right to grant easements and rights of way. Note that if Council is to make any use this clause, 9.6.8 (e) of the Draft Plan should be deleted.</p>	135	<p>This clause will be changed to clarify that public vehicle access via roads and car parks is permitted. Vehicle access for private access is not.</p>	noted	
<p>Easements and rights of Way 22. and 23.2. The council should not have the legal right to grant easements over the Town Belt. Easements are property rights granting them would in our opinion be contrary to the Deed ("without any power of the said trustees to (alienate) or dispose of the same").</p>	209	<p>Easements will be granted for any public purpose subject to the statutory principles which will be broadly based on the 1873 deed and guiding principles</p>	noted	
<p>Paragraph 9.1 provides that the mechanism provided by the Bill should ‘override the usual legislative requirements for stopping and creating legal road’. 7.3 We request that where the boundary adjustment would impact on a State highway, the NZTA’s agreement to the boundary adjustment should be obtained first.</p>	113	<p>Officers recommend the Council and NZTA agree on the specific boundary adjustments involving State Highway with NZTA before they are included within the local Act. Thus, upon the legislation being enacted, a set of specific adjustments will occur which both Council and NZTA have already agreed.</p>		
<p>Wellington Zoo, with a provision for the zoo to have its own management plan.</p>	120		noted	
<p>Secondly, the drafting instructions for the new Town Belt legislation should allow for transactions that result in a net increase in Town Belt area, rather than allowing increases but prohibiting decreases. A more flexible approach will enable faster growth of the Town Belt.</p>	135		noted	

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	<p>Save for any minor boundary adjustments (refer to paragraph 9 above), the Bill will not include a mechanism that allows Council to remove land from the Legal Town Belt. Removing any land from the Legal Town Belt would require a subsequent Act of Parliament."</p> <p>This clause is overly restrictive and will be counter-productive. A more flexible approach would be to allow land sales, but only in the context of transactions that result in a net increase in the area of the town belt. Council would gain flexibility to negotiate with private land-holders to create mutually advantageous solutions, leading to faster growth of the Town Belt and much lower transaction costs.</p>	135	<p>The bill will enable land to be added . It will be possible for land to be removed but this will require legislative change. The current review has identified all of the known opportunities for land to be added or removed.</p>	noted	
	<p>I do not agree that council should be given the right to include "any other land" that the council "considers ought to be legal Town Belt</p>	191	<p>This land has already been identified within the draft management plan and will be included in the draft bill which will go out for further consultation. .</p>	noted	
	<p>I do not support the retention of the Chest Hospital as a special area. Despite its historical interest, there was significant development for society and welfare needs in the 1800s, and we can't turn back the clock on most of that development, but we can with the Chest Hospital. I believe allowing use - which would require significant investment for earthquake strengthening and maintaining modern standards of wheelchair access/toilets etc - would create an additional imperative to develop access, carparking, more buildings and other land uses that would support revenue for the investing party. But it would not support returning the Town Belt to natural ecosystems/ open land. In particular, added roading /parking in this area may be required of a future tenant, whereas it would be ideal to reduce the land-cover development in the spirit of the rest of the Town Belt guiding principles.</p>	4	<p>The intention of this section is to require the local legislation to be drafted so that, in respect of the Chest Hospital and Zoo, it allows use of that land other than 'as a public recreation ground'; and a management regime that will accommodate using the Chest Hospital for community purposes (such as the current lease to the Wellington SPCA). The Council acquired the Chest Hospital from the Crown in 2002 for return to the Town Belt.</p>	reject	

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	We see it as crucial that no land can be removed from the Town Belt without an enabling Act of Parliament. Accordingly, we suggest that this caveat be given prominence in the formatting of the Act.	77		noted	
	Area governed by the Wellington City Exhibition Act 1959. As no current activities are remnants of this, Act should be revoked and land return to Town Belt. Table 5 p 120 states "in event of showgrounds use terminating, management of Showgrounds site should be integrated with that of the adjacent Town Belt".			noted	
	The most vital objective is to provide a mechanism for including in the Legal Town Belt extra pieces of land and giving them the same protection as the rest of the Legal Town Belt. The sooner the proposed legislation can be drafted the better. We look forward to the opportunity to comment further at that stage.	84		noted	
	want uncontroversial legislation.	250 & 86	local bills should wherever possible be uncontroversial	noted	
7.2 & 2.7 (MP)	do not agree - include any other land Council considers ought to be legal TB. Should only be done in compliance with criteria in Plan	191	This land addition will be assessed using the criteria in the management plan. The plan has already identified the lands that are likely to be included. These will be included in the draft bill and subject to further consultation. The bill provides a mechanism for adding land to Town Belt.	noted	
2.7 & 7.2 DI	other appropriate land - qualified by addition of non-TB land "appropriate adjacent and highly visible land"	77	SEE RESPONSE Ch2		
10 & 2.7	Provisions prohibiting sale of TB must be enhanced - no discretion to trustees	60	Not clear what additional safeguards are required The current instructions will require an act of Parliament for any subsequent removals.	noted	
	object to putting detail in a bill - eg events 2-4/yr	209		noted	
10	addition of land full public consultation - Council resolution - not delegated to officers	77	The final bill will be signed off by the Council prior to it being introduced into Parliament.	noted	
	opposed to provision in legislation that would allow any original TB to be sold	184	There will be no provision in legislation except in the original schedule of land to be removed This will be consulted on prior to enactment.	noted	
	oppose mechanism by which surplus land is made available to be sold	246	see above		

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Ch4.6 & DI	oppose legislation/policies that allow council to have 'flexible powers'; 'commercial activities & events' & "construction of buildings considered "desirable" to decision makers"	100	review wording around flexible powers and how this is manifested into the actual drafting.	accept	Provide Council with relatively flexible powers to manage the Local Town Belt provided that it does so in a way that is consistent with both the charitable purpose of the 1873 deed, and the management plan in force at the time, and the principles in paragraph 14 below.
ch6.2 & DI 11.3	further discussion on whether Council should adopt definition of recreation in Reserves Act. Disagree "emphasis ... retention of open spaces & outdoor recreation activities. Bias - favours informal recreation - does not promote balance between "natural areas ... with the demands from organized sports"	111 & 216	recreation and recreation ground will be defined in the draft bill.		
ch6.2 & DI 11.3	1995 plan - Reliance on 1839 was invalid. Reliance should be on Reserves Act - permits sports activities, excludes childcare/education from recreation reserve	126	Relevant parts of the Reserves Act are going to be included in the local bill. In place of sections 17 and 40 of the Reserves Act, the local Act will require Council to have regard to and seek to apply the statutory principles. It is expected that the statutory principles will cover much of the same ground as section 17 ("Recreation Reserves"), including freedom of entry and access. In place of the right of objection (s120 Reserves Act), the local bill will identify when public notification will occur eg for the granting of leases/licences, construction of building etc. However the final	noted	
Ch6.1 & DI 11.3	"recreation" should be universal term used for all activity that people engage in for enjoyment including children playing in a creche, adults making pots, directed - organised, undirected - spontaneous (examples)	32	recreation ground will be defined in the draft bill.	noted	
Ch6.1 & DI 11.3	recreation - definition hasn't change over time	182	recreation ground will be defined in the draft bill.	noted	
Ch6.1 & DI 11.3, 7.3	activities that are not recreation - zoo, spca - both activities will allow public to use	215	Yes and that is why these will be identified as special areas	noted	
Ch6.1 & DI 11.3, 18	to leave recreation to interpretation to Councillors & officers is not a good idea. No Commercial operators. Sports teams are tradable	77	recreation ground will be defined in the draft bill.	noted	
14.4 & ch6	No more than 5.9ha should be leased	109	The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares		
DI & ch9	lack of clarity in what is proposed. Lack of detailed policy guidance	160		noted	

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Ch6 SI & Ch 2 & DI	Additional TB land for sport - demark needs to be clear in law & in practise	36		noted	
6.4 & DI	no more land leased/unavailable for general use	127	The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares		
6 & DI	no more land should be leased	191	The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares		-
6	Areas leased should not increase beyond existing 5.9ha	142	The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares		
r	free public access is essential. Leasing land for exclusive use should be kept to a minimum	112	The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares		
r	leased land - no more than existing area (5.9ha). All leases, licences should be publically notified.	237	The Town Belt Hearings subcommittee have proposed this be reduced to 8 hectares		